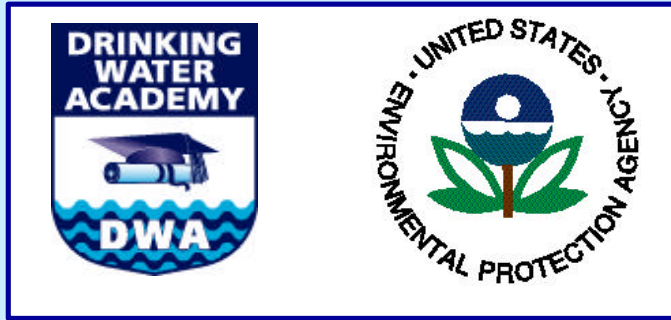


Consumer Confidence Reports EPA-State Training



Viewgraph: 1

Drinking Water Academy

- EPA Is Developing the Drinking Water Academy to Provide Information to States and Regions on a Variety of Office of Water Programs
- EPA has Developed A Web Site Where Training Materials Will Be Located
 - <http://www.epa.gov/OGWDW/DWA>
- This Training Will Be Available on this Web Site



Viewgraph: 2

Agenda

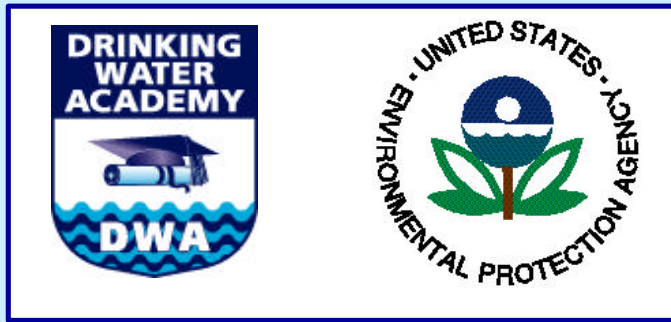
- **Welcome and Introductions**
- **Training Objectives**
- **CCR Slide Presentation**
 - **Background on Development of the CCR Rule and Implementation Guidance**
 - **Overview of the Rule and Key Dates**
 - **State Adoption and Primacy Revision Applications**
 - **Detailed Rule Summary**
 - **Workshops on Reviewing and Preparing CCRs**



Viewgraph: 3

The purpose of this presentation is to provide training on the CCR rule for Regional and State staff. The first day of this presentation is designed to provide EPA Regions and States with guidance on implementation of the CCR rule specifically, rule requirements, violation determination, and how States can apply for primacy revision. The second day of this presentation is designed for anyone who will prepare a CCR.

Background on Development of the CCR Rule and Implementation Guidance



Viewgraph: 4

Need for Consumer Confidence Reports

- Required by 1996 Safe Drinking Water Act (SDWA) Amendments
- Public Right-to-Know Emphasized in 1996 Amendments
- Consumer Confidence Reports (CCRs) Are the Centerpiece of Right-to-Know



Viewgraph: 5

The Consumer Confidence Report (CCR) rule is an important part of the 1996 Amendments to the Safe Drinking Water Act (SDWA). Reports issued under this rule will give consumers information on their drinking water and opportunities to get involved in protecting their source(s) of water. Under 40 CFR Part 141 Subpart O, all community water systems (CWSs) will be required to provide their customers with an annual water quality report or CCR.

CCRs Are:

- **A Means for Consumers to Make Informed Decisions Regarding Their Drinking Water**
- **A Means to Raise Consumers' Awareness Of:**
 - What Is Involved in the Delivery of Safe Drinking Water
 - The Sources of Their Drinking Water
 - The Importance of Source Water Protection
- **A Tool That**
 - Encourages Dialogue Between Consumers and Their Utilities
 - Provides a Starting Point for Consumers to Obtain More Information



Viewgraph: 6

The CCR rule provides a framework that water systems will use to provide information on their drinking water, including the water source, contaminants detected in finished water, health effects of contaminants when violations occur, likely sources of detected contaminants, and availability of source water assessments. By understanding their water supplies, customers, especially those with special health needs, can make informed decisions regarding their personal use of the drinking water.

States and water suppliers should view these reports as a public information tool to not only educate and involve the public but also to promote a dialogue between customers and their drinking water utilities. It is an opportunity that water systems can use to their advantage to explain how their community's drinking water supplies are protected.

Background: CCR Rule

- The CCR Rule Requires All Community Water Systems (CWSs) to Provide Annual Drinking Water Quality Reports to Their Customers
- CCR Regulations Will Apply to All 58,000 CWSs
- 94 Percent of CWSs Are Small Systems that Serve Fewer Than 10,000 People



Viewgraph: 7

Every CWS, defined as a system that serves at least 25 residents year round or that has at least fifteen service connections used by year-round residents, must prepare and distribute a CCR [40 CFR 141.151(b)].

Ninety-four percent of CWSs are small systems that serve fewer than 10,000 people. Sixty-two percent of those systems serve fewer than 500 people. The CCR rule does make allowances for these small systems to help them comply with the rule.

Rulemaking Process

- **The 1996 SDWA Amendments Required EPA to Engage in Broad Consultation While Developing the Regulation**
 - Received Comments From Utilities and Consumers Nationwide
 - Reviewed Draft Language with an "Expert Panel" of Risk Communicators and Health Information Providers
 - Discussed the Rule with the Local Government Advisory Committee
 - Convened a Working Group Under the Aegis of the National Drinking Water Advisory Council (NDWAC)



Viewgraph: 8

The 1996 SDWA Amendments required EPA to engage in consultation with a broad range of groups while developing the regulation. To analyze and debate issues related to the proposed rule, EPA convened a 1-day meeting of a panel of experts in public health and communication of risk-related information and engaged in numerous consultations. EPA also formed a working group under the aegis of the National Drinking Water Advisory Council (NDWAC).

NDWAC Working Group

- **NDWAC Working Group Representation**
 - Food and Drug Administration (FDA)
 - State Drinking Water Program Representatives
 - Consumer Advocates
 - Local Government
 - Local Health Officers
 - Environmental/Consumer Advocates
 - Community Water Systems
 - Drinking Water Wholesalers
 - Consultants



Viewgraph: 9

NDWAC Working Group (cont.)

- NDWAC Reviewed the Working Group's Draft and Made Recommendations
- EPA Based the Proposed Rule on NDWAC's Recommendations
- Proposed CCR Rule Published in the *Federal Register* on February 13, 1998



Viewgraph: 10

After numerous consultations, EPA drafted the proposed rule which was then reviewed by NDWAC. The provisions contained in the proposed rule included all the provisions for which NDWAC received consensus. The proposed rule was published in the *Federal Register* on February 13, 1998.

Focus Groups

- EPA Held Four Citizen Focus Groups with Randomly-Selected Participants to:
 - Test Mandatory Language
 - Critique Two CCRs (Denver Water and Washington Suburban Sanitary Commission) Based on the Proposed Rule



Viewgraph: 11

After the rule was proposed, EPA held a series of four focus groups with randomly-selected participants to:

- Test various alternatives for the definitions of Maximum Contaminant Level (MCL) and Maximum Contaminant Level Goal (MCLG).
- Gauge the public's reaction to mandatory language concerning health effects.
- Critique two CCRs developed in accordance with the proposed rule by Denver Water and the Washington Suburban Sanitary Commission.

Development of CCR Implementation Guidance

- Final CCR Rule Published in the *Federal Register* on August 19, 1998
- Implementation Guidance Intended for Use By:
 - States as They Develop Primacy Revision Applications
 - Regions as They Review the Applications



Viewgraph: 12

The CCR Implementation Guidance contains information that will aid States in implementing the rule and in applying for interim primacy. It also provides examples of ways in which CWSs can prepare and present data in the CCR. You will find information on the following topics:

- CCR rule requirements.
- Reporting and recordkeeping.
- Violation determination and SDWIS reporting.
- Content of State Primacy Revision Applications.
- State/EPA Implementation Agreements that cover the period prior to State submission of a complete and final primacy revision application, which results in interim primacy.

Development of CCR Implementation Guidance (cont.)

- CCR Implementation Workgroup Formed to Develop Draft CCR Implementation Guidance
- CCR Implementation Workgroup Originally Consisted of EPA Headquarters and Regional Members
- Legally, States Could Not Be Involved in Development of the Guidance Until After Rule Promulgation
- CCR State-EPA Workgroup Meeting Held November 19 and 20, 1998



Viewgraph: 13

In July 1998, shortly before the final rule was promulgated, a CCR implementation workgroup was formed to develop a draft CCR Implementation Guidance. The workgroup was composed of EPA Headquarters and Regional members.

Legally, States could not be involved in the guidance development process until after the rule promulgation in August 1998. In mid-September, the draft CCR Implementation Guidance was distributed to States for review and comment.

A CCR State-EPA workgroup meeting was held November 19 and 20, 1998 in San Francisco, California to provide additional opportunity for States to comment on the guidance document. At this meeting EPA presented major issues identified during the comment period to the States in order to achieve a consensus on how best to address these issues.

Implementation Aids

- **CCR Implementation Guidance for States and Regions**
 - **Section 1: Summary of the Rule Requirements**
 - **Section 2: Violation Determination and Associated Reporting Requirements**
 - **Section 3: Primacy Revision Applications**
 - **Appendices: Additional Information and Example Formats**
- **CCR Guidance for Water Suppliers**
- **EPA CCR Template (CCR Writer)**



Viewgraph: 14

EPA has developed implementation aids to assist States, EPA Regions, and CWSs to comply with this rule. Final versions of these products will be made available on the Internet at www.epa.gov/safewater/ccr1.html.

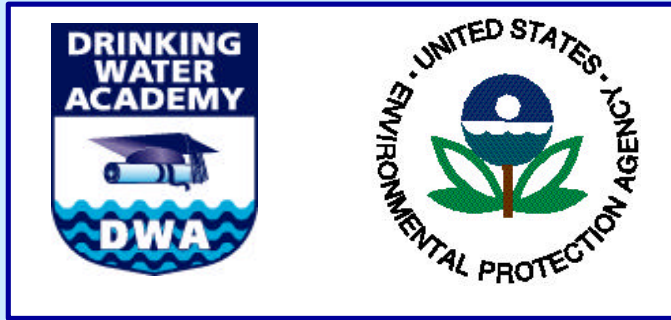
The CCR Implementation Guidance is targeted to States and Regions and contains sections on rule requirements, violation determination and SDWIS reporting requirements, and primacy revision applications — including procedures, content, and deadlines for submission.

The Appendices of the Implementation Guidance contain additional information and example formats useful to States and EPA Regions throughout the primacy revision process.

The CCR Guidance for Water Suppliers is targeted to CWS operators. This "how to manual" on preparing a CCR explains all of the report content, format, and distribution requirements.

The CCR computer template is designed to be a "fill-in the blank" template that CWSs may use to create a plain but effective CCR.

Overview of the Rule — Key Dates



Viewgraph: 15

Overview of the Rule

- **Key Dates of the Rule**
 - **Delivery Dates for:**
 - Existing CWSs
 - New CWSs
 - CWSs That Sell to Another CWS
- **Report Content Requirements**
- **Report Delivery and Recordkeeping Requirements for CWSs**
- **Recordkeeping Requirements for States**



Viewgraph: 16

The CCR rule adds significant new responsibilities for CWSs to prepare these reports and make them available to the public.

As part of a detailed rule summary key delivery dates for existing CWSs, new CWSs, and drinking water wholesalers are presented on the following slides.

The requirements of the CCR rule can be divided into two broad categories: 1) report content requirements; and 2) report delivery and recordkeeping requirements. There are different recordkeeping requirements for CWSs and States. Detailed information on these two categories is presented on the following slides.

Key Dates of the Rule

- **A CWS Must:**
 - **Mail or Otherwise Directly Deliver One Copy of the CCR to Its Customers by:**
 - **October 19, 1999 for the First Report**
 - **By July 1 Each Year Thereafter for Subsequent Reports**
 - **Provide a Copy of the CCR to the State and Any Other Agency the State Designates by the Report Due Date**
 - **Provide a Certification to the State Within 3 Months of the Report Due Date**



Viewgraph: 17

CWSs must deliver the first CCR to their customers within 13 months of the regulation's effective date, or by October 19, 1999. Delivery of the second report is due by July 1, 2000 and subsequent reports by July 1, each year thereafter.

No later than the date the CCR is required to be delivered to customers, the CWS must also mail a copy of the CCR to the primacy agency, as well as any other agency or clearinghouse the primacy agency designates [40 CFR 141.155(c) and (d)].

The CWS must also send certification to the State ensuring that the report was prepared and distributed in accordance with the CCR rule [40 CFR 141.155(c)]. The certification must be sent within 3 months of the report due date. Certifications must be sent to the primacy agency by January 19, 2000 for the first CCR and by October 1 annually for the second and subsequent reports.

Certification to the State

- **Certification Should Certify That the CWS:**
 - Distributed the CCR to its Customers
 - Used in the Report Information That Is Correct and Consistent with Compliance Monitoring Data Previously Submitted to the Primacy Agency
- **A CWS Does Have the Option to Deliver the Certification to the Primacy Agency at the Same Time it Delivers the CCR**



Viewgraph: 18

Within 3 months from the date the system is required to deliver its CCR to customers, the CWS must send a letter of certification to the primacy agency certifying that the system has: (1) distributed the CCR to its customers; and (2) used in the report information that is correct and consistent with compliance monitoring data previously submitted to the primacy agency [40 CFR 141.155(c)]. A CWS does have the option to deliver the certification to the primacy agency at the same time it delivers the CCR.

EPA recommends that States and EPA view the certification letter as an opportunity to explain how systems are telling customers about the quality of their drinking water and the steps taken to protect their source(s) of water.

CCR Delivery Dates for Existing CWSs

- Delivery of First CCR By October 19, 1999
- Delivery of First Certification By January 19, 2000
- Delivery of Second CCR By July 1, 2000
- Delivery of Second Certification By October 1, 2000
- Delivery of Subsequent CCRs By July 1 Annually
- Delivery of Subsequent Certifications By October 1 Annually



Viewgraph: 19

The first report must contain data used to determine compliance in calendar year 1998. The second report must contain data used to determine compliance in calendar year 1999. Each report thereafter must contain data used to determine compliance for each subsequent calendar year. Delivery of the second report is due by July 1, 2000 and subsequent reports by July 1 each year thereafter [40 CFR 141.152(b)].

CCR Delivery Dates for New CWSs

- | | |
|---|---|
| • Delivery of First CCR | By July 1 after the First Full Calendar Operating Year |
| • Delivery of First Certification | By October 1 after the First Full Calendar Operating Year |
| • Delivery of Subsequent CCRs | By July 1 Annually |
| • Delivery of Subsequent Certifications | By October 1 Annually |



Viewgraph: 20

New CWSs must prepare and deliver CCRs on the same schedule as existing systems and therefore have until July 1 after their first full calendar year of operation to deliver the first CCR to their customers [40 CFR 141.152(c)]. The certification for the first report must be sent to the primacy agency by October 1 after the first full calendar year of operation. For each year thereafter delivery of subsequent reports must be by July 1 and delivery of the certifications by October 1. Calendar year refers to January through December of monitoring data. For example, if a system begins operation in 2001, their first report would be due in 2003. This report would include data from January through December 2002.

CCR Delivery Dates for CWSs That Sell to Another CWS

- **Delivery of Data for First CCR** **By April 19, 1999**
(6 Months Before Retailers Are Required to Prepare Their CCR)
- **Delivery of Data for Subsequent CCRs** **By April 1 Annually**
(3 Months Before Retailers Are Required to Prepare Their CCR)
- **Wholesalers Must Deliver Their Data to the System(s) Purchasing Water by the Dates Shown, Unless a Different Date is Agreed to and Specifically Included in a Contract Between the Two Parties**



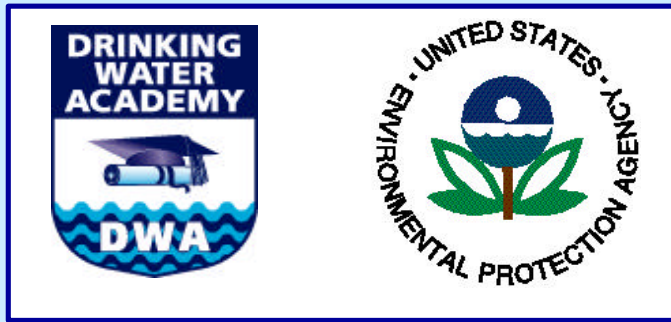
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Drinking water wholesalers are CWSs that sell water to other CWSs. Under this rule they must deliver relevant monitoring and compliance data to the retailers in enough time so that the retailer can prepare a CCR.

For the first CCR, drinking water wholesalers must provide data no later than 6 months before retailers are required to prepare their CCR or by April 19, 1999. For the second and subsequent reports, data must be delivered by April 1, annually thereafter.

Data for the CCR reports must be delivered by these dates, unless the wholesaler and retailer mutually agree upon a different date and specify it in a contract between the two parties [40 CFR 141.152(d)].

State Rule Adoption and Primacy Revision Applications



Viewgraph: 22

Primacy Requirements

- §1413 of SDWA
- 40 CFR 142
- Primacy Rule
 - Interim Primacy Provision
 - Increased Time Period to Adopt Federal Rules
 - Administrative Penalty Authority
 - Expanded Definition of a Public Water System (PWS)



Viewgraph: 23

As authorized by section 1413 of the Safe Drinking Water Act (SDWA) 40 CFR 142 establishes requirements for States to obtain and/or retain primary enforcement responsibility (primacy) for the Public Water System Supervision (PWSS) program. The 1996 SDWA Amendments modified the process for States to obtain and/or retain primacy by creating additional requirements. On April 28, 1998, EPA promulgated the Primacy Rule to reflect these statutory changes (63 FR 23361).

The Primacy Rule changed a State's primacy status while awaiting a final determination on its primacy application. The Primacy Rule also increased the time period for a State to adopt new or revised drinking water regulations from 18 months to 2 years after promulgation.

Other provisions of the Primacy Rule included adding a new administrative penalty authority and expanding the definition of a public water system (PWS).

Primacy Rule: Interim Primacy Provision

- **Grants Interim Primary Enforcement Authority to States While Their Applications to Modify Existing Primacy Programs Are Under Review**
- **Begins on the Date of the Submission of a Complete and Final Primacy Revision Application or the Effective Date of the State Regulation, Whichever Is Later**
- **Ends When a Final Determination Is Made Under 40 CFR 142.12(d)(3)**



Viewgraph: 24

The Primacy Rule codified the new process for granting primary enforcement authority to States while their applications to modify their primacy programs are under review (interim primacy). Previously, States that submitted these applications did not receive primacy for the changes in their State programs until EPA approved their application.

This interim enforcement authority begins on the date of the submission of a complete and final primacy revision application or the effective date of the new or revised State regulation, whichever is later, and ends when EPA makes a final determination.

Interim Primacy has no effect on EPA's final determination and States should not assume that their applications will be approved based on this interim primacy.

Primacy Rule: Interim Primacy Provision (cont.)

- **Prerequisites for Interim Primacy - 40 CFR 142.12(e)**
 - **State Must Have an Approved Primacy Program for All NPDWRs Promulgated to Date When a New or Revised Regulation Is Promulgated**
- **Combining Primacy Revision Applications**
 - **States May Combine Two or More Rules in One Revision Package and Receive Interim Primacy for Both**
 - **Interim Primacy Then Treated As Full Primacy for Other Rules Included in the Application**



Viewgraph: 25

New section 142.12(e) explains that any State already having primacy for all existing National Primary Drinking Water Regulations (NPDWRs) in effect when a new regulation is promulgated is considered to have interim primacy for a new or revised regulation, during the period in which EPA makes the determination with regard to the new or revised regulation.

This interim enforcement authority begins on the date the primacy revision application is submitted in complete and final form or the effective date of the new or revised State regulation, whichever is later, and ends when EPA makes a final determination.

Primacy Revision Applications

- **Must Be Submitted Following the Procedures in 40 CFR 142.12 (b) to (d)**
- **States Must Submit a Complete and Final Primacy Revision Application by August 21, 2000, Unless They Have Been Granted an Extension**
- **Until States Receive Interim Primacy, EPA is the Primacy Agent Directly Responsible for Implementing the CCR Rule**



Viewgraph: 26

States must submit a primacy revision application following procedures outlined in 40 CFR 142.12 (b) to (d) - Revision of State Programs. Until the primacy revision applications are submitted and approved, EPA Regions have responsibility for directly implementing the CCR rule. However, the State and EPA can agree to implement the rule together during this period, through a State-EPA Implementation Agreement.

Section III, A.4 of the Implementation Guidance provides further discussion of the options for documenting implementation agreements.

Primacy Revision Applications: Content



- State Primacy Checklist
- Text of the State Regulation
- Primacy Revision Crosswalk
- Checklist of State Reporting and Recordkeeping
- Attorney General's Statement of Enforceability



Viewgraph: 27

Each primacy revision application must contain these sections. Appendix A of the Implementation Guidance provides further information on the elements of a State's Primacy Revision Application Package.

State Primacy Checklist (Example Format)			
Required Program Elements		Revision to State Program (Yes or No)	EPA Findings/Comments
§142.10	Primary Enforcement		
§142.10(a)	Regulations No Less Stringent		
§142.10(b)(1)	Maintain Inventory		
§142.10(b)(2)	Sanitary Survey Program		
§142.10(b)(6)(vii)	Authority to Require CWSs to Provide CCRs		

Viewgraph: 28

This section of the primacy revision application is a checklist of program elements, taken from 40 CFR 142.10. In completing this checklist, the State must identify the program elements that it has revised in response to new federal requirements. The State should mark a "Yes" or "No" in the blank column next to the list of program elements. If a State indicates "Yes," we ask that they include the specific information/documentation relative to these changes. During the application review process, EPA will insert its findings and comments in the second blank.

For the CCR rule, most States will revise only §142.10(b)(6)(vii), authority to require CWSs to issue CCRs.

Primacy Revision Crosswalk (Example Format)



FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION Document title; page number; and section or paragraph	If different than federal requirement, note here and explain on separate sheet
Definitions	§141.153(c)		
General Requirements	§141.152		
Content of the CCRs	§141.153; §141.154		



Viewgraph: 29

The Primacy Revision Crosswalk identifies the State statutory or regulatory provisions that correspond to each federal requirement under 40 CFR 141. If the State's provisions differ from federal requirements, we ask the State to explain how their requirements are "no less stringent." The Primacy Revision Crosswalk for the CCR rule should be completely filled out and annotated as necessary.

State Reporting and Recordkeeping Checklist <i>(Example Format)</i>	
Requirement	Are State policies consistent with federal requirements? If not, explain
§142.16 (f) - Records kept by the States	
Each state must make CCRs submitted available to the public upon request	
Each state must maintain a copy of the CCRs for a period of one year	
Each state must keep a copy of the certifications obtained for a period of 5 years	
Each state must report violations in accordance with the requirements of §142.15(a)(1)	

**Viewgraph: 30**

This required checklist is for State reporting and recordkeeping requirements. The States can use this form to explain how State reporting and recordkeeping requirements are consistent with federal requirements for recordkeeping, 40 CFR 142.14, and reporting, 40 CFR 142.15. If State requirements are inconsistent with federal requirements, the State can use this form to explain how their requirements are "no less stringent."

Attorney General's Statement of Enforceability (Example Format)

I hereby certify, pursuant to my authority as _____(1)_____ and in accordance with the Safe Drinking Water Act as amended, and _____(2)_____, that in my opinion the laws of the State [Commonwealth] of _____(3)_____ [or tribal ordinances of _____(4)_____] to carry out the program set forth in the "Program Description" submitted by the _____(5)_____ have been duly adopted and are enforceable. The specific authorities provided are contained in statutes or regulations that are lawfully adopted at the time this Statement is approved and signed and will be fully effective by the time the program is approved.

Seal of Office _____

Signature _____

Name (Type or Print) _____

Title _____

Date _____

- (1) Attorney General or attorney for the primacy agency if it has independent legal counsel
(2) 40 CFR 142.12 (c)(1)(iii) for final requests for approval of program revisions
(3) Name of State or Commonwealth
(4) Name of Tribe
(5) Name of Primacy Agent



Viewgraph: 31

The primacy revision application must contain an Attorney General's Statement that the State regulations can be enforced by the State government.

Primacy Revision Applications: Extension Procedures

- **State Extension Request Must Include a Schedule for Submission of a Final Request, and**
- **Sufficient Information to Demonstrate That:**
 - **The State Cannot Submit a Package Because of One of the Reasons Below:**
 - **Currently Lacks the Legislative or Regulatory Authority for Enforcement; or**
 - **Currently Lacks the Program Capability to Implement; or**
 - **Is Requesting the Extension to Group 2 or More Program Revisions; and**
 - **The State is Implementing the Requirements Within the Scope of its Current Authority and Capabilities**



Viewgraph: 32

Under §142.12(b), States may request that the 2-year deadline for submitting the complete and final request for EPA approval of program revisions be extended for up to 2 additional years in certain circumstances. The extension request must be submitted to EPA within 2 years of when EPA promulgated the regulation. States can request an extension to the primacy revision process by submitting a written application to the Administrator in accordance with 40 CFR 142.12(b). The Regional Administrator has been delegated authority to approve extension applications. Headquarters concurrence of extension is not required.

For an extension to be granted, the State must demonstrate it is requesting the extension because it cannot meet the original deadline for reasons beyond its control despite a good faith effort to do so. A critical part of the extension application is the State's proposed schedule for submission of its complete and final request for approval of a revised primacy program.

Primacy Revision Applications: The Review Process

- **EPA Recommends a 2-Step Process**
 - Submission of Draft Request (Optional)
 - Submission of Complete and Final Request
- **For Complete and Final Revision Applications**
 - Review Process: 90 Days
 - Time Split Equally Between Regions and HQ: 45 Days
 - Regional Review (Program and Regional Counsel)
 - HQ Review (OGWDW, OECA, OGC)



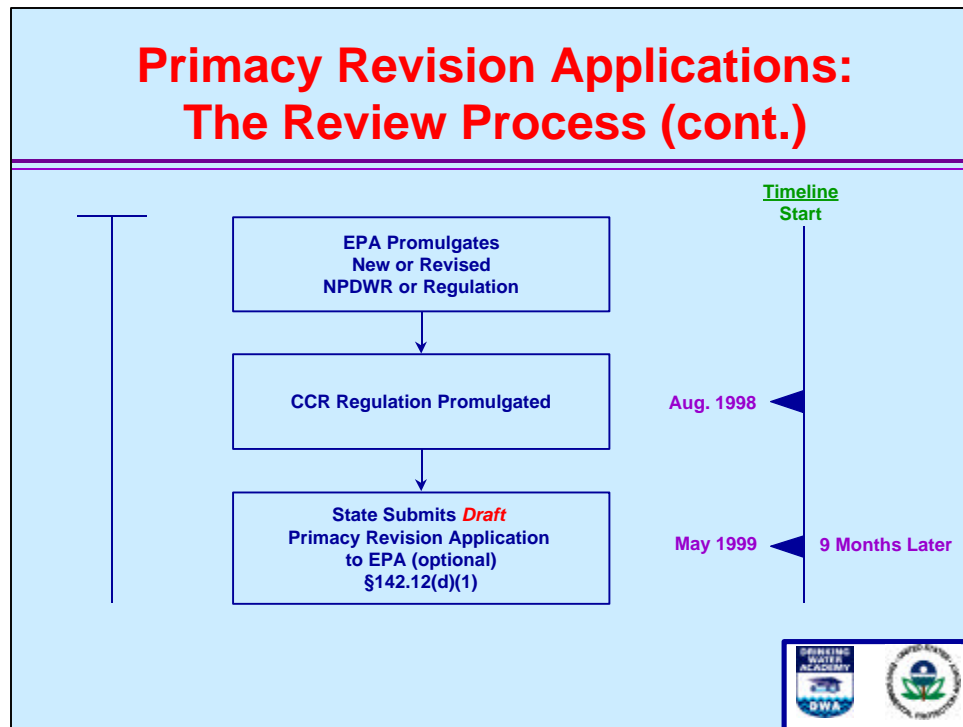
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EPA recommends a 2-step process comprised of submission of a draft primacy revision application (optional) and then submission of a complete and final primacy revision application.

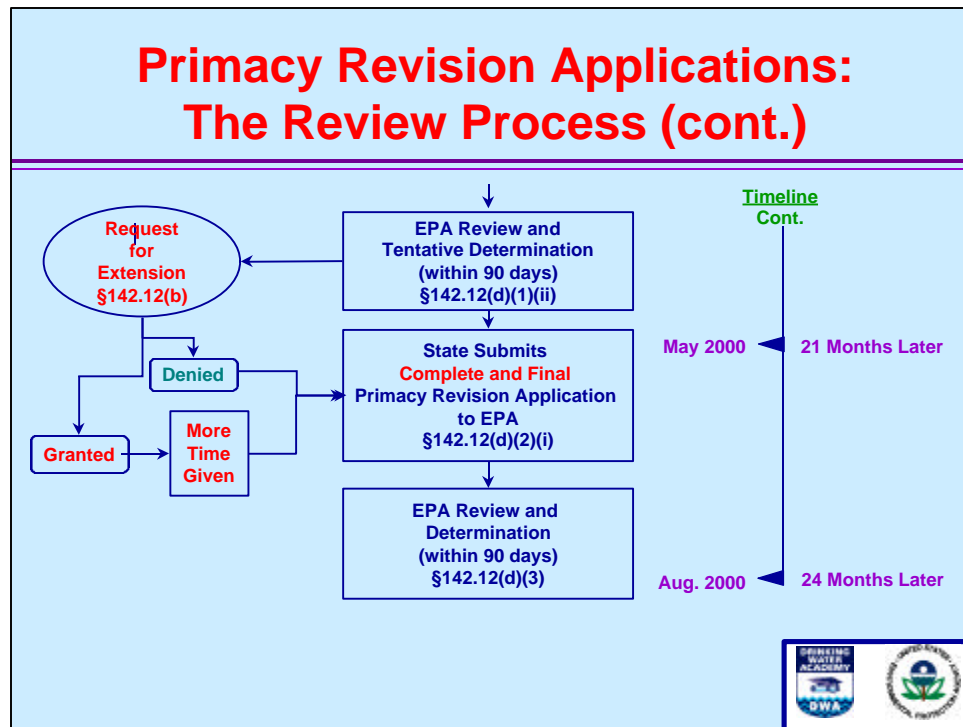
Draft Request - At their option, the State may submit a draft request for EPA review and tentative determination. The request should contain drafts of all required primacy application materials. We recommend that a draft request be submitted within 9 months after rule promulgation. We will make a tentative determination within 90 days on whether the draft request is appropriate and list any changes that must be made before approval.

Complete and Final Request - This submission must be in accordance with 40 CFR 142.12(c)(1) and (2) and include the Attorney General's statement. Submission of a final request that is not preceded by a draft request may result in EPA requiring changes to the final State regulations or policies.

Final Review Process - Once a State application is complete and final, EPA has a regulatory (and statutory) deadline of 90 days to review and either approve or disapprove the revised program. In order to meet the 90 day deadline for packages undergoing Headquarters review, the review period will be equally split giving the Regions and Headquarters each 45 days. EPA's Office of Ground Water and Drinking Water (OGWDW) will conduct detailed reviews of the first State package submitted to each Region. OGWDW reserves the privilege to review additional packages where necessary. EPA's Office of Enforcement and Compliance Assurance (OECA) will conduct detailed reviews of every State package. The Office of General Counsel (OGC) will not directly review but will depend on the Office of Regional Counsel (ORC) to conduct detailed reviews.



Viewgraph: 34



Viewgraph: 35

State/EPA Implementation Agreements

- **The Updated 40 CFR 142.12 Explains That States Must Adopt the Requirements of the CCR Rule Within 2 Years of the Final Rule's Publication or by August 21, 2000**
- **Most States Will Not Have Interim Primacy for the CCR Rule by October 19, 1999, When the First Reports Are Due**
- **Most Likely That the States and EPA Will Implement the Regulation in Partnership at Least for the First Set of Reports**



Viewgraph: 36

The updated 40 CFR 142.12 explains that States must adopt the requirements of the CCR rule within 2 years of the final rule's publication or by August 21, 2000. Until States receive interim primacy, EPA is the primacy agent responsible for implementation of this rule. During this interim period, EPA recognizes that it has the responsibility to ensure that systems are informed of the rule requirements and provided with training and assistance to prepare CCRs in accordance with the rule. EPA also has the responsibility for tracking State regulation adoption and implementation of the rule, as well as compliance with the rule.

Most States will not have interim primacy for the CCR rule by October 19, 1999, when the first reports are due, so it is likely that EPA and States will implement the regulation in partnership at least for the first set of reports. EPA's goal, especially for the first set of reports, is to aid and assist States and systems in complying with this new regulation.

Although the first reports are EPA's responsibility, we expect that most States will implement the rule to the extent that their authority allows. EPA plans to assist States in implementing this new regulation. To ensure that EPA and States understand their responsibilities, States and EPA Regions must agree on the responsibilities of each party until States receive interim primacy.

State/EPA Implementation Agreements (cont.)

- **Purpose of State/EPA Implementation Agreements:**
 - To Clearly Delineate the Responsibilities of the States During this Interim Period
 - To Allow EPA to Step in and Implement the Rule Where the State Is Not Able to Implement the Rule
- **Bottomline:** The States and EPA Must Agree on the Responsibilities of Each Party and Have That Agreement Documented



Viewgraph: 37

State/EPA Implementation Agreements (cont.)

- **Two Options For State/EPA Implementation Agreements**
 - **Region Independently Documents EPA Regional and State Roles**
 - **This Option Can Only Be Used Until August 21, 2000**
 - **Jointly Signed Memorandum of Understanding (MOU) That Describes the States and EPA's Roles**



Viewgraph: 38

One option for documenting this agreement is for the Region to independently document EPA regional and State roles. For example, the State and EPA could meet to discuss implementation and agree on roles during the meeting. The Region could then document the agreement and forward it to the State for comment/update. The final document would be forwarded by the Region to the State and EPA Headquarters. A second option for documenting this agreement is to jointly sign an Memorandum of Understanding (MOU) that describes the States and EPA's roles.

The first option is less burdensome to most States than a bilateral MOU. However, this option cannot be used after the rule has been promulgated for 2 years. After August 21, 2000, States that have not submitted a complete and final primacy revision application must operate under an extension agreement and jointly sign an MOU with EPA.

Appendix B of the Implementation Guidance contains an example of a Regional letter to the State and a draft MOU.

Areas of State Flexibility

- **Governor's Mailing Waiver**
 - For CWSs Serving Fewer Than 10,000 Persons
 - States in Accordance With Their Laws Can Establish Criteria for Obtaining and Renewing a Mailing Wavier
- **Additional Public Notice**
 - Systems Must Deliver the Report to Any Other Agency or Clearinghouse Identified by the Primacy Agency
 - **Example:** State or Local Public Health or Environmental Departments, Public Utility Commissions, and Consumer Advocates Offices



Viewgraph: 39

The CCR rule sets baseline standards to ensure that all consumers receive reports that are nationally consistent and which include the same type and amount of basic information. Where the CCR rule does not specify mandatory language or exact provisions, primacy States have discretion. Changes from federal requirements must be spelled out in a State's primacy revision application.

Governor's Mailing Waiver. Under 40 CFR 141.155(g), the Governor of a State or their designee can waive the mailing requirement for CWSs serving fewer than 10,000 persons. The rule States that a mailing waiver can be granted, but States, in accordance with their laws, have the flexibility to establish criteria for obtaining and renewing a mailing waiver. For example, a State can choose whether the waiver should be system-specific or apply to all systems in a given category.

Additional Public Notice. Under 40 CFR 141.155(d), systems must deliver the report to any other agency or clearinghouse identified by the primacy agency. Examples of other agencies a State may identify include State and local public health or environment departments, public utility commissions, and consumer advocates.

Governor's Mailing Waiver and additional public notice are discussed in detail later in the presentation (under Report Delivery and Recordkeeping Requirements)

Areas of State Flexibility (cont.)

- **Alternative Form and Content**
 - **Under §141.151(e), Primacy States May Adopt Alternative Requirements for the Form and Content of Reports**
 - **Must Provide for the Same Type and Level of Information as Specified in the Federal Rule**
 - **Must Provide Equivalent Level of Public Information and Education**
 - **States Do Not Have Flexibility to Change Form and Content Until They Have Obtained Interim Primacy**



Viewgraph: 40

Primacy States may adopt by rule, after notice and opportunity for public comment, alternative requirements for the form and contents of reports [40 CFR 141.151(e)]. Alternative requirements must provide for the same type and amount of information as specified in the federal rule as well as provide an equivalent level of public information and education.

Until States obtain interim primacy, the CCR rule does not provide States with the flexibility to change form and content.

Alternative Form and Content: MCL Reporting Format

- **§141.153(d)(4)(i) Requires That the MCL Be Reported As a Number Greater Than or Equal to 1**
- **Focus Group Research Conducted by EPA and AWWA Has Shown That Many Consumers Have Trouble Understanding Decimals**
- **EPA Believes Reporting the MCL in Other Formats Does Not Provide an Equivalent Level of Public Information and Education**



Viewgraph: 41

EPA proposed the requirement that MCLs be reported as a number greater than or equal to one because it believes that this format makes it easier to compare the level of a contaminant in the system's water with the MCL.

Focus group research conducted by EPA and AWWA has shown that consumers understand whole numbers better than decimals. Based on the focus group research, EPA does not believe that reporting the MCL in another format such as compliance values, provides an equivalent level of public information and education as specified under 40 CFR 141.151(e).

The format requirement, specified in 40 CFR 141.153(d)(4)(i), that the MCL be reported as a number greater than or equal to one cannot be changed.

MCL Reporting Format

Atrazine	MCLG	MCL	Detected
Compliance Values (mg/L)	0.003	0.003	0.0003
CCR Units (ppb)	3	3	0.3



Viewgraph: 42

Areas of State Flexibility (cont.)

- **Areas of State Flexibility for Content Requirements**

- | | |
|--|---|
| – §141.153(b) | Source Water Assessment Information |
| – §141.153(c) | Definitions: MCL, MCLG, TT, AL, and Variances and Exemptions |
| – §141.153(d)(4)(ix) | Likely Source(s) of Detected Contaminants |
| – §141.153(d)(6),
§141.153(f)(3)-(f)(4) | Potential Adverse Health Effects for Regulated Contaminants |



Viewgraph: 43

This is a summary of areas where primacy States have flexibility to modify content requirements.

Source Water Assessment Information: Determine the level of detail required in the CCR to summarize the results of a completed source water assessment, in accordance with State priorities and protection goals.

Definitions: Alter the wording of the definitions. States must provide standard language that meets the statutory intent of being “brief and plainly” worded.

Likely Source(s) of Detected Contaminants: Alter the wording of the language provided for typical sources in Appendix B to Subpart O of the rule. States must require systems to include information on specific sources, where it is available.

Potential Adverse Health Effects for Regulated Contaminants: Alter the wording of the health effects language in Appendix C to Subpart O of the rule. State regulations must require the use of a standard set of health effects language when a contaminant exceeds its MCL, TT, or AL. The language must, at a minimum, list the same health effects as in Appendix C to Subpart O of the rule.

Areas of State Flexibility (cont.)

- **Areas of State Flexibility for Content Requirements (cont.)**

- §141.153(h)(1) **Explanation of Contaminants Reasonably Expected to Be Found in Drinking Water, Including Bottled Water**
- §141.154(a) **Vulnerable Populations Warning**
- §141.154(b) to (d) **Educational Statements for Arsenic, Nitrate, and Lead**

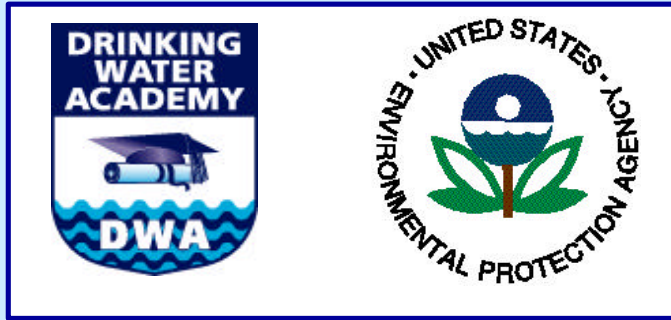


Viewgraph: 44

Explanation of Contaminants Reasonably Expected to be Found in Drinking Water: Alter the wording of the explanation. States must require the inclusion of an explanation of the contaminants that may be in drinking water, including bottled water, and provide reference to EPA's Safe Drinking Water Hotline (800-426-4791).

Required Additional Health Information — Vulnerable Populations Warning, Educational Statements for Arsenic, Nitrate, and Lead: Alter the wording of the warning for vulnerable populations and educational statements for arsenic, nitrate, and lead. CWSs may modify the educational statements after consultation with the primacy agency. States must require inclusion of a warning to vulnerable populations about the effects of *Cryptosporidium* and other microbial contaminants and information on how populations can protect themselves by referring to EPA/CDC guidelines.

Detailed Rule Summary
Report Content Requirements



Viewgraph: 45

Report Content Requirements

Item	Report Content Requirements
1	Required Information About the Water System
2	Source(s) of Water
3	Definitions
4	Reporting the Levels of Detected Contaminants



Viewgraph: 46

The CCR rule established eight items of information that must be included in the CCR. For additional information refer to the Implementation Guidance Section I,B.1: CCR Content Requirements.

Report Content Requirements (cont.)

Item	Report Content Requirements
5	Information on <i>Cryptosporidium</i> , Radon, and Other Contaminants
6	Required Additional Health Information
7	Information on Violations of NPDWR
8	Information if the System is Operating Under a Variance or Exemption



Viewgraph: 47

Item 1 — Water System Information

- **Telephone Number for Contact Person**
- **Information on Opportunities for Public Participation**
- **Non-English Speaking Notice**
 - **Primacy Agency Will Determine When this Is Required**
 - **Notice to Large Proportion of Non-English Speaking Residents in Their Language**



Viewgraph: 48

The system must identify itself, and include the following additional information:

The telephone number of a contact person at the water system who can provide additional information and answer questions about the report [40 CFR 141.153(h)(2)].

A listing of known opportunities for public participation in decision-making processes that affect drinking water quality (e.g., time and place of regularly- scheduled board meetings) [40 CFR 141.153(h)(4)]. If there are no regularly- scheduled meetings, the CWS must tell customers how they can get information when meetings are announced.

For communities with a large proportion of non-English speaking residents, provide information in the appropriate language(s) regarding the importance of the report or a telephone number or address where such residents may contact the system to obtain a translated copy of the report or assistance in the appropriate language [40 CFR 141.153(h)(3)]. EPA's intent is for systems to direct consumers that are seeking this information to the appropriate organization.

The primacy agency will determine when a population of non-English speaking residents is sufficiently large to require systems to take special measures for these residents. Appendix F of the Implementation Guidance contains additional information on incorporating information for non-English speaking residents into the CCR.

Item 2 — Information on Water Source(s)

- Type of Water
- Commonly-Used Name(s)
- Location(s) of Water Source
- Information on Source Water Assessments
 - Notice of Availability and Means to Obtain Completed Assessments
 - Summary of System's Susceptibility to Potential Sources of Contamination **if** the System Has an Assessment Which was Provided by or Approved by the Primacy Agency



Viewgraph: 49

A CWS must report the type of water (ground water, surface water, or a combination of the two) and the commonly-used name(s) (if sources are named) and locations of water source(s) [40 CFR 141.153(b)(1)].

If a source water assessment has been completed, the system must notify customers in the CCR that an assessment is available and tell them where to obtain a copy [40 CFR 141.153(b)(2)]. If the CWS has an assessment that was provided or approved by the primacy agency, the CCR must also include a brief summary of the system's susceptibility to potential sources of contamination using language provided by the primacy agency or written by the operator. Utilities could also use the reports to highlight additional local assessment and protection efforts which are planned or in place. In cases where a CWS has the available information, EPA encourages the system to highlight significant sources of contamination in the source water area.

Appendix I of the Implementation Guidance provides more detailed information on State Source Water Assessment Programs (SWAPs), wellhead protection programs and other source water information resources. In addition, Appendix I also contains information on susceptibility determinations and examples of how source water information can be included in the CCRs.

Item 3 — Definitions

- **REQUIRED**

- **Maximum Contaminant Level (MCL)**

- The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLG as feasible using the best available treatment technology.

- **Maximum Contaminant Level Goal (MCLG)**

- The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.



Viewgraph: 50

The CCR must include definitions of key regulatory terms that customers will need to understand the contaminant data. Each CCR must include the mandatory language used for definitions of Maximum Contaminant Level (MCL) and Maximum Contaminant Level Goal (MCLG).

Item 3 — Definitions (cont.)

- **If Applicable**
 - **Treatment Technique (TT)**
 - A required process intended to reduce the level of a contaminant in drinking water.
 - **Action Level (AL)**
 - The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.
 - **Variances and Exemptions**
 - State or EPA permission not to meet an MCL or a treatment technique under certain conditions.



Viewgraph: 51

If the report contains information on a contaminant that is regulated as an Action Level or Treatment Technique, the mandatory language must be included as applicable. If the CWS operates under a variance or exemption, the CCR must include the required definition for variances and exemptions.

Item 4 — Reporting the Levels of Detected Contaminants

- CCR Key Element — **Table(s)** Reporting Levels of Detected Contaminants Subject to Mandatory Monitoring
- If the Following Contaminants are **Detected**, the Table(s) Must Contain the Appropriate Monitoring Data:
 - Regulated Contaminants (i.e. Subject to an MCL, AL, or TT)
 - Unregulated Contaminants as Specified in 40 CFR 141.40
 - Finished Water DBPs or Microbial Contaminants From Monitoring Under the Information Collection Rule (Except Results for *Cryptosporidium*)
- The Table(s) May Only Include Information on Detected Contaminants, All Other Information Must Be Displayed Elsewhere



Viewgraph: 52

One key element of the CCR is the table (or series of adjacent tables) that reports the levels of detected contaminants. This table(s) must display the highest contaminant level used to determine compliance and the ranges of contaminant levels when compliance is based on an average of samples. The table(s) must contain data related to finished water monitoring for the following contaminants:

- Regulated contaminants - i.e., contaminants subject to an MCL, AL, or TT.
- Unregulated contaminants - i.e. contaminants for which monitoring is required under 40 CFR 141.40 - Special monitoring for inorganic and organic contaminants.
- Disinfection byproducts or microbial contaminants for which monitoring is required under 40 CFR 141.142 and 141.143 (i.e., the Information Collection Rule (ICR)) except results of monitoring for *Cryptosporidium*).

Only the results of ICR finished water monitoring are required to be included in the table(s). Any additional monitoring results which a CWS chooses to include in the CCR must be displayed separately.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **Systems Must Report Monitoring Data Completed During the Previous Calendar Year**
- **Results from the Most Recent Testing Period Should Be Included for Systems:**
 - That Monitor Less Frequently Than Annually
 - That Have Monitoring Waivers
 - CCR Should Include a Statement That Monitoring Is Done in Accordance With Regulations
- **No Data Older Than 5 Years Need Be Included in the Report**



Viewgraph: 53

Systems must report data from monitoring completed during the past calendar year. When systems have monitoring waivers or for another reason monitor less often than once per year, they should include in the table information on contaminants detected in the most recent testing period. Therefore, if a system monitors once every 3 years for a contaminant and detected that contaminant in the last sample, it would need to report the same detected level in each of the 3 years until it takes a new sample.

The report must also contain a brief statement explaining that the data presented is from the most recent testing done in accordance with regulations. Section I, B.1: Item 4 of the Implementation Guidance contains a statement that systems can use to explain their monitoring requirements.

No data older than 5 years need be included in the first or subsequent reports.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **A Detected Contaminant is: Any Contaminant Detected At or Above EPA's Minimum Detection Limits Prescribed by:**
 - 40 CFR 141.23(a)(4)(i) For Inorganics
 - 40 CFR 141.24(f)(7) For Organics Listed in 40 CFR 141.61(a)
 - 40 CFR 141.24(h)(18) For Organics Listed in 40 CFR 141.61(c)
 - 40 CFR 141.25(c) For Radionuclides



Viewgraph: 54

Under the CCR rule, a detected contaminant is any contaminant detected at or above the detection limits prescribed in the CFR sections listed above.

Most Primacy States have their own regulations specifying Minimum Detection Limits (MDLs) for these contaminants which may be more stringent and take precedence over EPA's values.

The detection levels for some contaminants such as lead, copper, and many of the disinfection byproducts are not included in the CFR sections above.

If a system's laboratory analysis provides a detected value for a contaminant not listed in the detection limit table provided in Appendix G of the Implementation Guidance, the system must report the contaminant in the CCR.

Contaminants that are not detected, or are detected below the MCL should not be included in the CCR detected contaminants table.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **Table(s) Must Display for Each Detected Contaminant:**
 - **MCL for the Contaminant Expressed as a Number Greater Than or Equal to 1**
 - **If A Contaminant is Regulated by TT or AL, Include That Value Instead of the MCL**
 - **MCLG for the Contaminant in the Same Units as the MCL**
 - **Highest Level of the Contaminant Used to Determine Compliance and the Range of Detected Levels**
 - **Expressed in the Same Units as the MCL**



Viewgraph: 55

The table(s) must contain information for each detected inorganic and organic contaminant, radionuclide, and unregulated contaminant.

The table(s) must display:

- The MCL for that contaminant expressed as a number equal to or greater than 1. Appendix H, Table H-1 of the Implementation Guidance illustrates how to convert MCL compliance values into CCR units. If the contaminant is regulated as a treatment technique, put the words "TT" in place of the MCL. If the contaminant is regulated as an action level, specify the AL applicable to that contaminant.
- The MCLG for that contaminant expressed in the same units as the MCL (refer to Appendix H, Table H-1 of the Implementation Guidance).
- The highest level of that contaminant used to determine compliance with a NPDWR and the range of detected levels, expressed in the same units as the MCL and MCLG.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

Contaminant (units)	MCL	MCLG	Town Water Level Found	Range of Detections	Sample Date	Violation	Typical Source
Organic Contaminants							
Atrazine (ppb)	3	3	4	0.1 - 10		Yes	Runoff from herbicide used on row crops.



Viewgraph: 56

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **For Detected Unregulated Contaminants for Which Monitoring Is Required (except *Cryptosporidium*)**
 - Table(s) Must Contain the Average of Any Monitoring Results from the Year **and** the Range of Detections
 - The CCR May Also Include a Brief Explanation for Why a System Monitors for Unregulated Contaminants



Viewgraph: 57

If the system detects unregulated contaminants for which monitoring is required (except *Cryptosporidium*), the table(s) must contain the average of any monitoring results from the year and the range of detections. The CCR may also include a brief explanation for why a system monitors for unregulated contaminants. The explanation may read as follows:

Unregulated contaminants are those for which EPA has not established drinking water standards. The purpose of unregulated contaminant monitoring is to assist EPA in determining the occurrence of unregulated contaminants in drinking water and whether future regulation is warranted.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **Table(s) Must Contain The Likely Source(s) of Each Detected Contaminant, According to the Best Information Known to the Water System**
- **Specific Information Regarding Contaminants Should Be Used When Available**
- **If the System Is Uncertain of a Contaminant's Source, It Must Include One or More of the Typical Sources From Appendix B of the Rule That Is Most Applicable to the Local Situation**



Viewgraph: 58

The table(s) must contain the likely source(s) of that contaminant, according to the best information known to the water system. Specific information regarding contaminants may be available in sanitary surveys and source water assessments and should be used when available to the operator. If the system lacks specific information on the likely source, the report must include one or more of the typical sources for that contaminant listed in Appendix B to Subpart O of the rule which are most applicable to the local situation.

The report should identify a specific point source, such as "Al's Chicken Houses" or the "Super Shiny Paper Mill" if possible but may use generic terms from Appendix B to Subpart O such as "farms" or "paper mills" in the absence of specific information from sanitary surveys, source water assessments or other means. If none of the generic sources from Appendix B to Subpart O are applicable to the system, a footnote may be added to indicate that to the best of the system's knowledge none of the typical sources of contamination listed in the table(s) for that contaminant exist in the source water area(s).

A copy of Appendix B to Subpart O of the regulation is provided in Appendix H, Table H-2 of the Implementation Guidance.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **For Any Detected Contaminant That Violates an MCL, a TT, or Exceeds an AL, the CCR Must Contain:**
 - **A Clear Indication in the Table(s) of the Violation or Exceedence**
 - **Near By, but Not In, the Table(s), a Clear and Easy to Understand Explanation of the Violation**
 - **An Explanation of the Violation Includes Length, Potential Health Effects, and CWSs Actions**



Viewgraph: 59

For any contaminant that violates an MCL, a TT, or exceeds an AL, include a clear indication in the table(s) of the violation or exceedence. This indication could, for example, take the form of a different color type, a larger or heavier font, or a large star. Near by, but not in, the table(s), include a clear and easy to understand statement explaining not only the violation, but also the length of the violation, potential health effects because of the violation, and the actions that have been taken by the CWS to remedy the problem. The potential health effects language must be from Appendix C to Subpart O of the rule, a copy of which is included in Appendix H, Table H-2 of the Implementation Guidance.

EPA recognizes that there may be cases where a State MCL may be more stringent than the federal standard and recommends that systems use the CCR to inform their customers of such occurrences. This could be easily accomplished by highlighting the MCL through a different font or asterisk and explaining in a footnote to the table that the State standard is stricter. EPA also recommends that customers should be informed when there is no federal standard and the State has developed its own standard. Appendix F of the Implementation Guidance contains a sample CCR and additional instruction on presenting such information.

Item 4 — Reporting the Levels of Detected Contaminants (cont.)

- **Systems That Distribute Water to Their Customers from Multiple Hydraulically Independent Distribution Systems Fed From Different Raw Water Sources Should:**
 - **Include in the Table(s) Separate Columns for Detection Data for Each Service Area**
 - **Include a Description of the Area Served by Each Distribution System**



Viewgraph: 60

If the system distributes water to its customers from multiple hydraulically independent distribution systems fed from different raw water sources, include in the table(s) separate columns for detection data for each service area. Also include a description of the area served by each distribution system.

How Do You Report Monitoring Data If Compliance is Determined:

- **Annually or Less Frequently?**
 - Highest Detected Level and Range
- **By a Running Annual Average of All the Samples Taken From a Sampling Point?**
 - Highest Average at One Point and Range of All Points
- **By Calculating a Running Annual Average of All the Samples at All the Sampling Points?**
 - Average and Range of All Samples



Viewgraph: 61

If compliance with the MCL is determined annually or less frequently (for example, many inorganic and organic chemical contaminants), include the highest detected level at any sampling point and the range of detected levels.

If compliance with the MCL is determined by a running annual average of all the samples taken from a sampling point [for example, inorganic contaminants specified in 40 CFR 141.23(i)], include the highest average of any of the sampling points and the range of detections at all sampling points.

If compliance with the MCL is determined by calculating a running annual average of all samples at all sampling points (for example, TTHMs), include the average of all samples and the range of detected levels.

Rounding Detected Levels

- Prior to Conversion to MCL Equivalent Units
- Example: Glyphosate Detected at 0.055 mg/l

	Detected (mg/l)	Compliance (mg/l)	Multiply by. . .	Units For CCR (ppb)
Monitoring	0.055	0.06	1,000	60
MCL		0.7	1,000	700



Viewgraph: 62

When rounding off results to determine compliance with the MCL is allowed by the regulations, rounding should be done prior to multiplying the results by the factor listed in Appendix A to Subpart O of the rule. A copy of that appendix is provided in Appendix H, Table H-1 of the Implementation Guidance.

How Do You Report Monitoring Data For Turbidity?

- **For Turbidity MCL**
 - Include the Highest Average Monthly Value
 - Although an Explanation for Why Turbidity Is Measured is Not Required in this Situation, a CWS May Wish to Include Such an Explanation
- **For Criteria to Avoid Filtration**
 - Include the Highest Single Measurement in a Month
 - An Explanation for Why Turbidity is Measured Should Be Included



Viewgraph: 63

For turbidity as a MCL the system should include the highest average monthly value (40 CFR 141.13). Although an explanation for why turbidity is measured is not required in this situation, a CWS may wish to include such an explanation in the CCR. This applies to unfiltered systems required to filter.

Criteria to avoid filtration the system should include the highest single measurement (40 CFR 141.71). An explanation for why turbidity is measured should be included. Suggested language in Section I, B.1: Item 4 of the Implementation Guidance reads as follows:

Turbidity is a measure of the cloudiness of the water. We monitor it because it is a good indication of the quality of water and the effectiveness of disinfectants.

How Do You Report Monitoring Data For Turbidity? (cont.)

- **For a TT/Indicator of Filtration Performance**
 - **Include the Highest Single Measurement and the Lowest Monthly Percentage of Samples Meeting the Turbidity Limits for the Relevant Filtration Technology**
 - **An Explanation of the Reasons for Measuring Turbidity Must Be Included**



Viewgraph: 64

For turbidity as a TT/indicator of filtration performance the system should include the highest single measurement and the lowest monthly percentage of samples meeting the turbidity limits specified in 40 CFR 141.73 for the relevant filtration technology (40 CFR 141.73). An explanation of the reasons for measuring turbidity should be included. Suggested language in Section I, B.1: Item 4 of the Implementation Guidance was provided on the previous page.

Revised Turbidity Reporting Requirements

- Revised, by the Interim Enhanced Surface Water Treatment Rule (IESWTR)
- For Systems Using Conventional or Direct Filtration
 - *Current Standard*
 - 5 NTU/Maximum and 0.5 NTU in At Least 95 Percent of Samples
 - *Revised Standard*
 - 1 NTU/Maximum and 0.3 NTU in At Least 95 Percent of Samples
- New Requirement Becomes Effective in 2001



Viewgraph: 65

The final Interim Enhanced Surface Water Treatment Rule (IESWTR) [63 FR 69516, December 16, 1998], revised the turbidity reporting requirements in 40 CFR 141.73. New section 40 CFR 141.173 states that: for systems using conventional filtration or direct filtration, the current turbidity standard of 5 NTU as a maximum and 0.5 NTU in at least 95 percent of the measurements taken has been revised to 1 NTU as a maximum and 0.3 NTU in at least 95percent of the samples taken. The revised requirement, which becomes effective January 2002, applies to surface water systems or ground water systems under the direct influence of surface water (GWUDI) that serve 10,000 or more people and are required to filter under the Surface Water Treatment Rule (SWTR). The IESWTR also amended section 141.153(a)(4)(v)(c) of the CCR rule to reflect the revised turbidity standard.

Information or data about reporting pursuant to this revised standard are not required to be included in the first CCR. The regulation does not specify where the turbidity explanations should be placed in the report. However, due to space limitations within the table, a CWS may choose to place this explanation outside of the table, elsewhere in the report. Appendix F of the Implementation Guidance illustrates how to present turbidity data.

How Do You Report Monitoring Data For:

- **Lead and Copper?**
 - Include the 90th Percentile Value from the Most Recent Sampling and the Number of Sampling Sites Exceeding the Action Level
- **Total Coliform?**
 - For Systems That Collect Fewer Than 40 Samples Per Month
 - Include the Highest Number of Positive Samples Collected in One Month
 - For Systems That Collect 40 or More Samples per Month
 - Include the Highest Percentage of Positive Samples Collected in One Month



Viewgraph: 66

If lead and/or copper is detected, the table(s) must contain the 90th percentile value from the most recent sampling and the number of sampling sites exceeding the action level.

For total coliform, systems that collect fewer than 40 samples per month must include the highest number of positive samples collected in one month in the table(s). Systems that collect 40 or more samples per month they must include the highest percentage of positive samples collected in one month in the table(s).

How Do You Report Monitoring Data For: (cont.)

- **Fecal Coliform?**
 - Include the Total Number of Positive Samples for the Year
- ***E. Coli*?**
 - Systems That Test for *E. Coli* Should Include the Total Number of Positive Samples for the Year



Viewgraph: 67

For fecal coliform, systems must include the total number of positive samples for the year.

Although the rule does not mention *E. Coli*, CWSs that test for *E. Coli* instead of fecal coliform should include the total number of positive samples for the year

How Do You Report Monitoring Data For: (cont.)

- Radiological Contaminants?
 - Regulated Contaminants (Radium-226, Radium-228, Gross Alpha, and Beta Particle and Photon Radioactivity) When Detected at Levels Above the Minimum Detection Limit
 - The MCL for Beta Particles is 4 mrem/year. EPA considers 50 pCi/L to Be the Level of Concern for Beta Particles.



Viewgraph: 68

Item 5 — *Cryptosporidium*, Radon, Other Contaminants

- If *Cryptosporidium* and/or Radon Are Not Detected, the System is Not Required to Discuss the Monitoring or the Results
- If *Cryptosporidium* and/or Radon Are Detected, the System Must Include the Required Information Outside of the Table(s) of Detected Contaminants



Viewgraph: 69

If a system monitored for *Cryptosporidium* and/or radon and did not detect them, the system is not required to discuss the monitoring or the results in the report. However if monitoring did indicate the presence of either of these contaminants, information about the monitoring and results of the monitoring must be included in the CCR and displayed outside of the table(s) reporting the levels of detected contaminants.

Item 5 — *Cryptosporidium*

- If *Cryptosporidium* Monitoring Indicates a Presence of *Cryptosporidium* the CCR Must Contain:
 - A Summary of the Monitoring Results
 - CWSs May Choose Whether or Not to Report the Actual Analytical Results as a Part of This Summary
 - An Explanation of the Significance of the Results



Viewgraph: 70

If the system has performed any monitoring for *Cryptosporidium*, including monitoring to satisfy ICR requirements, which indicates that *Cryptosporidium* may be present either in its source water or its finished water, the CCR must contain:

- A summary of the results of the monitoring. CWSs may choose whether or not to report the actual analytical results as a part of this summary.
- An explanation of the significance of the results. CWSs should tell customers if they need to be concerned by this information. A sample explanation given in Section I, B.1: Item 5 of the Implementation Guidance reads as follows:

Cryptosporidium is a microbial parasite which is found in surface water throughout the U.S. Although filtration removes cryptosporidium, the most commonly- used filtration methods cannot guarantee 100 percent removal. Our monitoring indicates the presence of these organisms in our source water and/or finished water. Current test methods do not allow us to determine if the organisms are dead or if they are capable of causing disease. Ingestion of cryptosporidium may cause crptosporidiosis, an abdominal infection. Symptoms of infection include nausea, diarrhea, and abdominal cramps. Most healthy individuals are able to overcome the disease within a few weeks. However, immuno-compromised people have more difficulty and are at greater risk of developing severe, life threatening illness. We encourage immuno-compromised individuals are encouraged to consult their doctor regarding appropriate precautions to take to avoid infection. Cryptosporidium must be ingested for it to cause disease, and may be passed through means other than drinking water.

Item 5 — Radon

- **If Radon Monitoring Indicates a Presence of Radon in the Finished Water the CCR Must Contain:**
 - **The Monitoring Results**
 - **An Explanation of the Significance of the Results**



Viewgraph: 71

If the system has performed any monitoring that indicates the presence of radon in its finished water, the CCR must contain:

- The results of the monitoring.
- An explanation of the significance of the results. A possible explanation given in Section I, B.1: Item 5 of the Implementation Guidance reads as follows:

Radon is a radioactive gas that you cannot see, taste, or smell. It is found throughout the United States. Radon can move up through the ground and into a home through cracks and holes in the foundation. Radon can build up to high levels in all types of homes. Radon can also get into indoor air when released from tap water from showering, washing dishes, and other household activities. Compared to radon entering the home through soil, radon entering the home through tap water will in most cases be a small source of radon in indoor air. Radon is a known human carcinogen. Breathing air containing radon can lead to lung cancer. Drinking water containing radon may also cause increased risk of stomach cancer. If you are concerned about radon in your home, test the air in your home. Testing is inexpensive and easy. Fix your home if the level of radon in your air is 4 picocuries per liter of air (pCi/l) or higher. There are simple ways to fix a radon problem that aren't too costly. For additional information, call your State radon program or call EPA's Radon Hotline (800-SOS-RADON).

Item 5 — Other Contaminants

- **Other Contaminants**
 - Including Information in the CCR Optional
 - EPA **Strongly Encourages** CWSs to Report Any Results That May Indicate a Health Concern
 - Recommended That the Report Include:
 - Monitoring Results
 - Explanation of the Significance of the Results Noting the Existence of a Health Advisory or a Proposed Regulation
 - Resources for Information
 - EPA's Safe Drinking Water Hotline: 800-426-4791
 - EPA Website: www.epa.gov/safewater/hfacts.html



Viewgraph: 72

If the system has voluntarily performed additional monitoring and this monitoring indicates the presence of other non-regulated contaminants in the finished water, EPA **strongly encourages** CWSs to report any results that may indicate a health concern. EPA considers detects above a proposed MCL or health advisory level to indicate possible health concerns. The Safe Drinking Water Hotline (800-426-4791) and the EPA Website (www.epa.gov/safewater/hfacts.html) are resources for this information.

For such contaminants, EPA recommends that the report include:

- The results of monitoring.
- An explanation of the significance of the results noting the existence of a health advisory or a proposed regulation.
- This information must be displayed outside of the detected contaminants table(s).

Item 6 — Required Additional Health Information

- **Every CCR Must Contain 2 Statements Prominently Displayed Somewhere in the Report**
 - **Drinking Water/Bottled Water Contaminant Explanation**
 - **Warning about the Vulnerability of Some Populations to Contaminants in Drinking Water**



Viewgraph: 73

Every CCR must contain the following two statements, prominently displayed somewhere in the report. The first statement is a brief explanation regarding contaminants which may reasonably be expected to be found in drinking water, including bottled water [40 CFR 141.153(h)(1)]. The second statement informs customers that some people may be more vulnerable to contaminants in drinking water than the general population and encourages those who may be particularly at risk from infection to seek advice from their health care provider [40 CFR 141.154(a)].

Item 6 — Required Additional Health Information (cont.)

- **Drinking Water/Bottled Water Contaminant Explanation**
 - **Explanation Contains Both Mandatory Language and Language That Can Be Altered by the System**
 - **Mandatory Language [§141.153(h)(1)(iv) of the Rule]**
 - **Every CCR Must Contain This Text**
 - **Statement That the Presence of Contaminants Does Not Necessarily Indicate a Health Risk**
 - **Include EPA's Safe Drinking Water Hotline Number**



Viewgraph: 74

The drinking water/bottled water contaminant explanation contains both mandatory language and language that can be altered by the system. The language of paragraph §141.153(h)(1)(iv) of the rule shown in Section I, B.1: Item 6 of the Implementation Guidance is mandatory. Every CCR must contain the statement that the presence of contaminants does not necessarily indicate a health risk, and reference EPA's Safe Drinking Water Hotline.

Item 6 — Required Additional Health Information (cont.)

– Mandatory Language (cont.)

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPA's Safe Drinking Water Hotline (800-426-4791).

– Language That Can Be Altered by the System [§141.153(h)(1)(i) - (iii) of the Rule]

- Information on Sources of Drinking Water
- Contaminants That May Be Present in Source Water
- Why EPA and the Food and Drug Administration (FDA) Establish Regulations



Viewgraph: 75

CWSs must also include in this explanation information on sources of drinking water, contaminants that may be present in source water, and why EPA and Food and Drug Administration (FDA) establish regulations for contaminants respectively. CWSs have the choice of using the EPA language provided in §141.153(h)(1)(i) through (iii) of the rule or developing their own comparable language. The EPA language is also provided in the Implementation Guidance under Section I, B.1: Item 6.

Item 6 — Required Additional Health Information (cont.)

- **Warning about the Vulnerability of Some Populations to Microbial Contaminants in Drinking Water**
 - **Explanation Encourages Those Who May Be Particularly at Risk from Infections to Seek Advice from Health Care Provider**
 - **EPA Safe Drinking Water Hotline Number Included to Access More Information**
 - **Mandatory Language Provided**



Viewgraph: 76

This mandatory vulnerable populations warning informs customers that some people may be more vulnerable to contaminants in drinking water than the general population and encourages those who may be particularly at risk from infections to seek advice from their health care provider.

Section I, B.1: Item 6 of the Implementation Guidance provides the required language.

Item 6 — Required Additional Health Information (cont.)

- **Mandatory Language for Warning to Vulnerable Populations**

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. EPA/Centers for Disease Control and Prevention (CDC) guidelines on appropriate means to lessen the risk of infection by Cryptosporidium and other microbial contaminants are available from the Safe Drinking Water Hotline (800-426-4791).

- **Every CCR Must Contain This Explanation, Prominently Displayed Somewhere in the Report**



Viewgraph: 77

Item 6 — Required Additional Health Information (cont.)

- **Educational Information about Arsenic, Nitrate, and Lead, If Detected as Follows:**
 - **If Arsenic Found At Least 25 µg/l (50 Percent of MCL), But Below the MCL**
 - **If Nitrate Found At Least 5 mg/l (50 Percent of MCL), But Below the MCL**
 - **If Lead Above Action Level in More than 5 Percent but Fewer than 10 Percent of Homes Sampled**



Viewgraph: 78

A CCR must also contain additional educational material about arsenic, nitrate, and lead if those contaminants are detected under the following circumstances:

- Arsenic at levels above 25 µg/l (50 percent of the MCL), but below the MCL.
- Nitrate at levels above 5 mg/l (50 percent of the MCL), but below the MCL.
- Lead above the action level of 15 µg/l in more than 5 percent, but fewer than 10 percent, of sites sampled.
- Note: Due to the difficulty of determining the action level between 5 percent and 10 percent of sites sampled when using small sample sizes, systems collecting fewer than 20 samples do not have to include the lead educational statement. However, EPA strongly recommends inclusion of this information. Refer to Appendix F of the Implementation Guidance for further explanation.

EPA requires that the appropriate educational statement be included in the report. EPA believes that water systems should have the flexibility to tailor their information to specific local situations. For systems who want to use significantly different language, they must develop comparable language in consultation with the primacy agency.

Systems can add information on arsenic, nitrate, or lead in conjunction with these educational statements, as long it does not detract from the educational nature of the report as specified in 40 CFR 141.153(h)(5). Section I, B.1: Item 6 of the Implementation Guidance contains the educational statements.

Item 6 — Required Additional Health Information (cont.)

- **TTHMs Health Effects Language**
 - **EPA Has the Authority to Require Health Effects Language for Up to Three Regulated Contaminants**
 - **EPA Is Requiring Additional Health Effects Language for Systems that Exceed the New MCL for TTHMs, But are Below the Current MCL**
 - **Current MCL — 100 ppb**
 - **Revised MCL — 80 ppb**
 - **Compliance with the Revised MCL is Not Required Until 2001 for Subpart H Systems**
 - **Compliance for All Systems Is Not Required Until 2003**



Viewgraph: 79

As stated in the preamble to the final CCR rule [p. 44514], the 1996 SDWA Amendments authorized the Administrator to require inclusion of language describing health concerns in CCRs for “not more than three regulated contaminants” other than those detected at levels above the MCL. EPA will use this authority in future rulemaking to require health effects language for contaminants when MCLs are promulgated or revised. The health effects language will be included in the reports of systems which are not in violation of the regulations because the MCL is not yet effective, but which detect the contaminant above the new or revised MCL.

The revised MCL for TTHMs is the first occasion where EPA exercised this authority. In the final Stage 1 Disinfectants/Disinfection Byproducts Rule (D/DBPR) [63 FR 69475, 16 December 1998], EPA amended the CCR rule to require systems that exceed the revised MCL of 80 ppb for TTHMs, but are below the current MCL of 100 ppb, to include health effects language in their CCRs.

Compliance with the revised MCL is not required until December 2001 however systems serving more than 10,000 persons that detect TTHMs at levels between the current and revised MCLs must include TTHMs health effects language in their reports, beginning with the first CCR due in October 1999. Systems that serve less than 10,000 persons are not affected by this CCR requirement. Refer to Appendix F of the Implementation Guidance to see how data for TTHMs can be presented in the CCR.

Item 7 — Information on NPDWR Violations

- **Violations of the National Primary Drinking Water Regulation (NPDWR) Requirements Listed Below Must Be Reported:**
 - **Monitoring and Reporting of Compliance Data**
 - **Recordkeeping of Compliance Data**
 - **Filtration and Disinfection Prescribed by Subpart H (40 CFR 141.70 to 141.75)**
 - **Lead and Copper Control Requirements Prescribed by Subpart I (40 CFR 141.80 to 141.84)**



Viewgraph: 80

CWSs must report violations of the National Primary Drinking Water Regulation (NPDWR) requirements. The following information is required:

- Monitoring and reporting of compliance data.
- Recordkeeping of compliance data.
- Filtration and disinfection prescribed by Subpart H (§141.70 to §141.75).
- Lead and copper control requirements prescribed by Subpart I (§141.80 to §141.84).

Item 7 — Information on NPDWR Violations (cont.)

- **Violations of the NPDWR Requirements Listed Below Must Be Reported: (cont.)**
 - Treatment Techniques for Acrylamide and Epichlorohydrin Prescribed by Subpart K (40 CFR 141.110 - 141.111)
 - Special Monitoring Requirements Prescribed by:
 - 40 CFR 141.40 for Inorganic and Organic Contaminants
 - 40 CFR 141.41 for Sodium
 - Violation of the Terms of a Variance, an Exemption, or a State or Federal Administrative or Judicial Order



Viewgraph: 81

CWSs must report violations of the NPDWR requirements. The following information is required:

- Treatment techniques for Acrylamide and Epichlorohydrin prescribed by Subpart K (§141.110 to §141.111).
- Special monitoring requirements as prescribed by 40 CFR 141.40 for inorganic and organic contaminants and 40 CFR 141.41 for sodium.
- Violation of the terms of a variance, an exemption, or a State or federal administrative or judicial order.

Item 7 — Information on NPDWR Violations (cont.)

- For These Violations the CCR Must Include:
 - A Clear and Readily Understandable Explanation of the Violation
 - Any Potential Adverse Health Effects
 - Steps the CWS Has Taken to Correct the Violation



Viewgraph: 82

If, during the reporting period, the CWS was in violation of any of the following NPDWR requirements, its CCR must include a clear and readily understandable explanation of the violation, any potential adverse health effects, and steps the CWS has taken to correct the violation.

Item 7 — Information on NPDWR Violations (cont.)

- EPA is Requiring Mandatory Language to Describe the Health Significance for **Only 3** NPDWR Violations
 - Filtration and Disinfection (Subpart H)
 - Lead and Copper Control Requirements (Subpart I)
 - TTs for Acrylamide and Epichlorohydrin (Subpart K)
- Explanations for the Remaining 4 NPDWR Violations Should Be Tailored to Each Violation



Viewgraph: 83

EPA is requiring mandatory language to describe the health significance for only 3 NPDWR violations.

For systems which have failed to install adequate filtration or disinfection equipment or processes, or have had a failure of such equipment or processes which constitutes a violation, the CCR must include the following language as part of the explanation of potential adverse health effects:

Inadequately treated water may contain disease-causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches.

The CCR must include applicable language for violations of Lead and Copper Control Requirements and violations of treatment techniques for Acrylamide and Epichlorohydrin from Appendix C to Subpart O of the rule. A copy of that appendix is provided in Appendix H, Table H-1 of the Implementation Guidance.

The agency is not prescribing mandatory language for all violations because the explanation has to be tailored to the circumstances of the violation. In cases where there is a health significance, the CWS may use relevant language from Appendix C to Subpart O of the rule.

Item 8 — Information if CWS Operating Under a Variance or Exemption

- **CCR Must Contain an Explanation for Why Variance or Exemption Was Issued**
 - **Reasons for Issue**
 - **Date of Issue and When it is Up For Renewal**
 - **What the System Is Doing to Remedy the Problem**
 - **Notice of Any Opportunity for Public Input in Review or Renewal of Variance or Exemption**



Viewgraph: 84

If the CWS is operating under a variance or exemption, the CCR must include:

- A section that explains that the system is operating under a variance or exemption, and the reasons it was issued.
- The date that it was issued and when it is up for renewal.
- A status report on what the system is doing to remedy the problem.
- A notice of any opportunity for public input in the review, or renewal, of the variance or exemption.

CCR Compliance Checklist

- **Guidance Contains an Optional Checklist That States May Use to:**
 - **Determine if the System has Met the Content Requirements**
 - **Determine if the System has Met the Delivery Requirements**



Viewgraph: 85

The "CCR Compliance Checklist," in Section II, C of the Implementation Guidance is provided as an optional tool that may help CWSs and regulators determine whether they have satisfied the content and delivery requirements as specified in the rule. If a CWS can answer "Yes" to each of these items, then it is most likely that the system's CCR meets content requirements and the requirements for CCR distribution.

Workshop 1

- Review Example Consumer Confidence Report Provided by EPA in the Guidance for Water Suppliers



Viewgraph: 86

This workshop will familiarize participants with the format of the reference sheet; minimum CCR content criteria; the example CCR; and use of the reference sheet for evaluating report content. A discussion of use of the reference sheet for reviewing report delivery will complete the workshop.

Workshop 1



Viewgraph: 87

Workshop 1

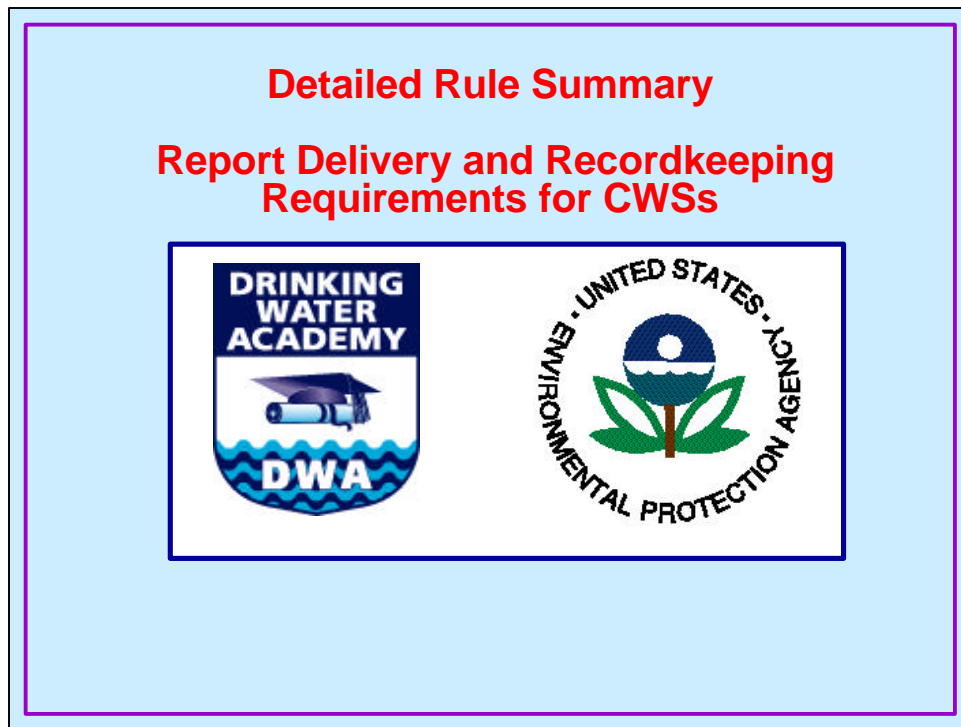


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Report Delivery and Recordkeeping Requirements for CWSs

Item	Report Delivery and Recordkeeping Requirements for CWSs
1	CCR Delivery to Customers
2	"Good Faith" Effort for Delivery to Non-Bill Paying Consumers
3	Delivery of CCR and Certification to Primacy Agency
4	CCR Delivery to Other Agencies



Viewgraph: 91

The CCR rule established eight report delivery and recordkeeping requirements for CWSs. For additional information refer to Section I, B.2: Report Delivery and Recordkeeping Requirements for CWSs.

Report Delivery and Recordkeeping Requirements for CWSs (cont.)

Item	Report Delivery and Recordkeeping Requirements for CWSs
5	CCR Availability to the Public
6	CCR Availability on the Internet
7	Mailing Waiver to CWSs Serving Fewer Than 10,000 Persons
8	CWS Keeping Copies on File



Viewgraph: 92

CCR Delivery Requirements for CWSs

- **Systems Must Mail or Otherwise Directly Deliver One Copy of the CCR to:**
 - Customers
 - Primacy Agency
 - Any Other Agency Identified by the Primacy Agency
 - Examples: Public Utility Commission; State Consumer Advocate



Viewgraph: 93

Section 141.155(a) of the rule requires CWSs to mail or otherwise directly deliver a copy of the CCR to each of their customers.

Under section 141.155(c) and (d) of the rule, a CWS must also mail a copy of the CCR to the primacy agency, as well as any other agency or clearinghouse the primacy agency designates, no later than the date the CCR is required to be delivered to customers. The mailing may be in an electronic or hard copy format. Examples of other agencies may include state and local public health or environment departments, public utility commissions and consumer advocates' offices.

CCR Delivery Requirements for CWSs (cont.)

- **"Good Faith" Efforts**
 - **Systems Must Make "Good Faith" Efforts to Reach Consumers Who Do Not Receive Water Bills**
 - **Example: Renters**
 - **"Good Faith" Efforts Include, But Are Not Limited to:**
 - **Internet Posting**
 - **Mailing to Postal Patrons**
 - **Publishing in Local Newspapers**
 - **Delivering Multiple Copies to Single-Biller Customers**
 - **Posting CCR in a Public Place (i.e., Schools or Libraries)**



Viewgraph: 94

As required under section 141.155(b) of the rule, CWSs must make "good faith" efforts to reach consumers who do not get water bills, using means recommended by the primacy agency. EPA decided to mandate direct delivery of CCRs only to bill addressees, but at the same time EPA expects CWSs to make serious and "good faith" efforts to reach non-bill paying consumers.

A "good faith" effort means selecting the most appropriate methods to reach those consumers from a menu of options recommended by the primacy agency.

EPA does not want to place an undue burden on the systems, but believes that it is in the systems' interest to spread the word about the quality of its water as widely as possible. CWSs should know that there are a variety of options that can be tailored to each specific local situation to reach non-bill paying consumers. EPA would interpret the inclusion of a note in the CCR, asking recipients to share the information with non-bill paying consumers, as part of a "good faith" effort.

CCR Delivery Requirements for CWSs (cont.)

- **Certification**
 - **Systems Must Send to the Primacy Agency, Within 3 Months From the Report Due Date a Certification Letter**
 - **Letter Certifies the System Has:**
 - **Distributed the CCR to Its Customers**
 - **Used in the Report Information That Is Correct and Consistent With Compliance Monitoring Data Previously Submitted to the Agency**
 - **Systems Have the Option of Mailing the Certification at the Same Time It Delivers the CCR to the Primacy Agency**



Viewgraph: 95

EPA recommends that States and CWSs view the certification letter as another opportunity to explain how systems are telling customers about the quality of their drinking water and steps taken to protect sources of their water. Therefore, States are encouraged to have CWSs certify that they comply with all the regulatory requirements of the CCR rule and include information on how they made a "good faith" effort to reach consumers that do not get water bills; include date(s) and method(s) of distribution, including names of newspapers, if applicable; list other means of making the report available to the public; and list the other agencies the CCR was sent to as directed by the primacy agency.

Appendix C of the Implementation Guidance contains example formats for the CCR certification. The first format is for a basic CCR certification where the required two elements are shown. Where State rules allow, systems may be asked to provide additional information on how the CCR was distributed. The remaining example formats are for these enhanced certifications.

CCR Certification: Basic Example Format

System name: _____

PWS I.D. no: _____

The community water system indicated above hereby confirms that the Consumer Confidence Report has been distributed to customers (and appropriate notices of availability have been given) in accordance with 40 CFR §141.155. Further, the system certifies that the information contained in the report is correct and consistent with the compliance monitoring data previously submitted to the primacy agency.

Certified by: Name _____

Title _____

Phone # _____ Date _____



Viewgraph: 96

CCR Delivery Requirements for CWSs (cont.)

- **Systems Must Make Reports Available to the Public Upon Request**
 - **Systems Must Keep Copies of Past CCRs on File for at Least 5 Years**
- **Systems Serving 100,000 Must Post CCRs on the Internet**
 - **EPA Will Link to Reports That It Is Aware of**
 - **Trade Associations May Provide this Service to Members**



Viewgraph: 97

CWSs must make their CCRs available to members of the public who request them. This means that systems must provide a copy of the report to any member of the public who requests it. Systems must keep copies of past reports on file for at least five years. Systems may choose to make their reports available in the newspaper, on a web site, or in public places such as libraries, but this does not relieve them of the responsibility to send the reports to interested customers or other members of the public who may not have access to these other resources. Each CWS serving 100,000 or more persons must post the CCR on a publicly-accessible site on the Internet.

CCR Delivery Requirements for CWSs (cont.)

- **Small Systems (Serving Fewer Than 10,000 People)**
 - **Must Prepare a CCR**
 - **May Be Exempt From Mailing CCR**
 - **If a System is Granted a Mailing Waiver, the System Must Advertise the Availability of the CCR**



Viewgraph: 98

CCR Mailing Waivers

- **Under §141.155(g), Mailing of the CCR Can Be Waived For Systems Serving Fewer Than 10,000 People by the Following Authorities:**
 - The Governor of a State or His/Her Designee
 - A Tribal Leader If the Tribe Has Met the Requirements for Tribal Eligibility under §142.72
 - The EPA Regional Administrator on Some Indian Lands Where No Tribe Has Been Deemed Eligible
- **Systems Are Still Expected to Use "Good Faith" Efforts to Reach Non-Bill Paying Customers**



Viewgraph: 99

Under §141.155(g) of the rule, the Governor of a State or his/her designee may waive the report mailing/direct delivery requirement for systems serving fewer than 10,000 persons. If a tribe has met the eligibility requirements contained in 40 CFR 142.72 for the purpose of waiving the mailing requirements, then Tribal leaders may grant mailing waivers for systems serving fewer than 10,000 persons. On Indian lands where no tribe has been deemed eligible, the authority to grant mailing waivers is delegated to the EPA Regional Administrator who in consultation with the tribal government can grant a mailing waiver.

When the proper authority has granted the mailing waiver, the systems must take steps each year to make their customers aware of the CCR. A system which has been granted a mailing waiver may choose at any time to mail its report to customers instead of publishing it in the newspaper.

Systems that have been granted mailing waivers are still required to follow other CCR rule requirements such as delivery of the report to the primacy agency and any other agency the primacy agency designates and using "good faith" efforts to reach non-bill paying consumers. A "good faith" effort means selecting the most appropriate methods from those recommended by the primacy agency to reach those consumers.

CCR Mailing Waivers (cont.)

- **System Serving Fewer Than 10,000, but More Than 500 Persons**
 - **Must Publish the Report in One or More Local Newspapers**
 - **Inform Customers That the CCR Will Not Be Mailed**
 - **Provide Information on the Availability of the CCR**
 - **Options Include: A Note in the Water Bill, or Any Other Means Approved by The Primacy Agency**
 - **Must Make the CCR Available to the Public Upon Request**



Viewgraph: 100

A system that has been granted a mailing waiver and serves fewer than 10,000 but more than 500 persons must publish the report in at least one local newspaper. The system must also inform its customers that the reports will not be mailed and provide information on the availability of the report. This could take the form of a note in the water bill, an ad in the newspaper, or any other means approved by the primacy agency. Finally, the system must make the reports available to the public upon request. This means that a system must send, fax, or otherwise deliver a copy of the report to a member of the public who requests the CCR.

CCR Mailing Waivers (cont.)

- **Systems Serving 500 or Fewer Persons**
 - **Must Provide Notice to Their Customers That the CCR is Available By:**
 - Mail
 - Door to Door Delivery
 - Posting a Notice in a Public Location (i.e., Libraries, City Hall, Grocery Store Bulletin Boards)
 - **Must Make the CCR Available to the Public Upon Request**



Viewgraph: 101

A system that has been granted a mailing waiver and serves 500 or fewer persons does not have to publish the report in a newspaper, nor inform customers the CCR will not be mailed, if they provide notice at least once per year that the report is available upon request. This means that if a member of the public requests it, the CWS must send or otherwise deliver a copy of the CCR. Methods of notification include mail, door to door delivery, or posting in an appropriate public location such as city hall, libraries, or grocery store bulletin boards. A system must provide notice using one of the three methods specified in the rule. Systems do have the option to use other methods of notification in addition to those specified in the rule, if they feel it is appropriate.

CCR Mailing Waiver: Primacy Agency

- If Allowed by State Law, A Governor May Delegate Authority to Sign Waivers to the State Drinking Water Administrator
- The Waiver Can Be Included In the State Regulations When the Regulation is Promulgated
- A Governor May Issue the Waiver Before the State Has Promulgated Its Own Regulation
- States Can Establish Criteria for Obtaining and Renewing Waivers



Viewgraph: 102

Depending on the circumstance, the CCR rule gives a Governor of a State or their designee, Tribal leader, or Regional Administrator the authority to sign a mailing waiver for systems serving fewer than 10,000 persons. If allowed by State law, a Governor may delegate authority to sign the waiver to the State drinking water administrator. The waiver may be included as part of State regulations when they are promulgated. A State may issue the waiver before it has promulgated its own regulations (i.e., while EPA is directly implementing the rule.) States in accordance with their laws can also establish criteria for obtaining and renewing the waivers. For example, a State can choose whether the waiver should be system-specific or apply to all systems in a given category. Appendix D of the Implementation Guidance contains example formats for a Governor's mailing waiver.

Report Recordkeeping Requirements

- **States**
 - **States Must Maintain a Copy of the Report for Each Water System for a Period of 1 Year**
 - **States Must Also Keep the Corresponding Certifications CWSs Send for a Period of 5 Years**
- **CWSs**
 - **Must Keep Copies of Past Reports for a Minimum of 5 Years**



Viewgraph: 103

Under 40 CFR 142.16(f)(3), each State that has primary enforcement responsibility must maintain a copy of the report for each water system in the State for a period of 1 year. The State must also keep the corresponding certifications CWSs are required to send to the primacy agency under 40 CFR 141.155(c) for a period of 5 years. The certifications indicate that a copy of the CCR was distributed or made available (as appropriate) to customers by the due date; and that the report contained information correct and consistent with compliance monitoring data previously submitted to the primacy agency. Where State rules allow, systems may be asked to provide additional information on how the CCR was distributed.

CWSs must keep copies of past reports on file for a minimum of 5 years. [40 CFR 141.155(h)]

Violation Determination

- **Two Types of Violations Proposed for the CCR Rule**
 - **Major Violation**
 - **CCR Report Violation (Failure to Produce and/or Deliver Report)**
 - **Minor Violation**
 - **CCR Adequacy/Availability/Content Violation**



Viewgraph: 104

There are two types of violations that must be reported under the CCR rule. Of those violations, one is categorized as major and the other as minor.

We do not expect significant numbers of the minor adequacy/availability/content violations to be reported to SDWIS for the first CCRs. However after the first 2 years, EPA expects States to track and report all violations.

Appendix E of the Implementation Guidance provides more detailed information on violation and compliance achieved definitions, and reporting requirements for each violation type. In addition, Appendix E contains examples on what to report, including how to report utilizing the appropriate SDWIS/FED Data Transfer File Format.

Violation Determination (cont.)

- **CCR Report Violation (Major)**
 - **When the CWS Fails to Produce and Deliver a Copy of the CCR to the Public and to the Primacy Agency by the Due Date in the Rule:**
 - **First Report - by October 19, 1999**
 - **Subsequent Reports - by July 1, Each Year Thereafter**
 - **If the State Determines That the Report Is Significantly Deficient in Content, Contains Falsified Information, or That the System Failed to Adequately Deliver the Report**



Viewgraph: 105

A CCR report violation occurs when the CWS fails to produce and deliver a copy of the CCR to the public and to the primacy agency by the due date in the rule. The CWS must send a copy of the first report to the primacy agency by October 19, 1999. The primacy agency must receive subsequent reports by July 1, each year thereafter.

In circumstances where States find that a system issued a report that is significantly deficient in content, contains falsified information, or that the system failed to adequately deliver the report, States should view these inadequacies as significant and report a major CCR report violation.

Violation Determination (cont.)

- **CCR Adequacy/Availability/Content Violation (Minor)**
 - When the CWS Fails to Include the Required Language, Content and/or Meet the Requirements to make the Reports Available to the Public as Specified in the Rule
 - When the CWS Fails to Provide the Required Certification to the Primacy Agency Within 3 Months of the Required Delivery Date



Viewgraph: 106

A CCR adequacy/availability/content violation occurs when the CWS fails to include the required language, content, and/or meet the requirements to make reports available to the public as specified in the rule.

States should report failure to provide a certification to the State and any other agencies the State designates within 3 months of the CCR due date as a minor violation. The certification should certify that the report contained correct information and was distributed in accordance with the rule.

The primacy agency will determine compliance with these requirements and, when found to be in violation (inadequate for any area), will report a CCR adequacy/availability/content violation. This type of violation means that the CCR has met some but not all of the requirements for either report content or distribution.

CCR Compliance Strategy

- EPA Expects That States Will Inform All CWSs of the Requirements to Complete CCRs
- CWSs Are Responsible for Completing CCRs
- EPA Is Developing a CCR Compliance Strategy
- Goals:
 - Ensure CCRs Are Issued in a Timely Manner
 - Provide the Best Public Education Possible
 - Consistent Approach for Systems That Do Not Prepare Reports



Viewgraph: 107

During the first years of implementation of this rule, EPA intends for the focus to be on whether a CWS prepared an educational CCR and distributed it in accordance with the rule. Several resources such as templates provided by EPA as well as other organizations are available to help systems produce the report. Therefore, EPA expects that most of the reports will adequately meet the report content requirements under the rule.

Regions I, IV, and IX, with the Office of Water (OW) and the Office of Enforcement and Compliance Assurance (OECA) are developing a compliance strategy for the CCR rule.

CCR Compliance Strategy (cont.)

- **Assumptions**
 - Simple
 - Strategy Outlines EPA Actions
 - EPA Could Forego Steps of the CCR Compliance Strategy Where a State Has Agreed, Through A State/EPA Implementation Agreement, to Undertake Steps
 - Strategy Implemented for All States Until They Receive Interim Primacy



Viewgraph: 108

CCR Compliance Strategy (cont.)

- **CCR Compliance Strategy Steps**
 - **Compliance Determinations**
 - EPA Would Work With States to Verify Receipt of Reports by the Due Date and Compile a List of Systems That Did Not Issue Reports
 - **Non-Compliance Letters and Regional Press Releases**
 - Approximately One Month After Violations Are Required to Be Reported to SDWIS, EPA Would Send Letters to Systems on List
 - Letter Informs Systems of Their Violation Status, Steps to Return to Compliance, Time Frames, and Possible Enforcement Actions
 - EPA Press Release Naming Systems That Did Not Issue A Report
 - **Formal Enforcement Actions**



Viewgraph: 109

CCR Compliance Strategy (cont.)

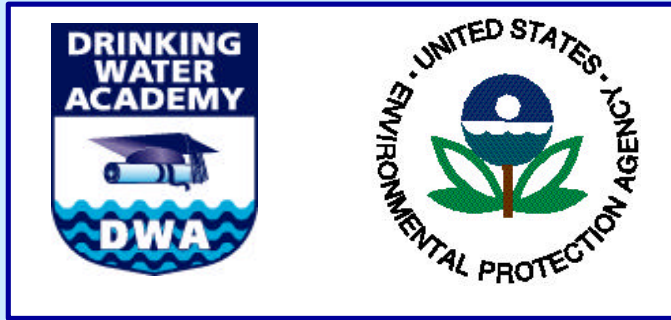
- **Quality Check on Reports**
 - It is Important for EPA to Show a Meaningful Effort in Reviewing the Quality of Some Reports
 - EPA Recognizes that Regions and States Have Limited Resources and May Wish to Prioritize the Allocation of Those Resources in Reviewing CCRs
 - Substance of Reviews May Vary by State
 - Some Options Include:
 - Systems Serving More Than 100,000 Persons
 - Random Checks
 - Systems with a History of Violation or Current SNCs



Viewgraph: 110

EPA further recognizes that States and Regions have limited resources and may wish to prioritize the allocation of those resources in reviewing the CCRs. For example, States could develop review procedures based on criteria such as population served, SNC status, and violation history. States may wish to prioritize water systems and take special care to ensure that those considered high priority such as the largest systems in the State or systems with a record of non-compliance issue CCRs completely, accurately and on-time.

Consumer Confidence Reports EPA-State Training



Day 2 — Preparing a CCR

Viewgraph: 111

The following slides provide a quick overview of the rule. For detail information see slides included in the presentation on Day 1 or the Implementation Guidance.

Report Content Requirements

Item	Report Content Requirements
1	Required Information About the Water System
2	Source(s) of Water
3	Definitions
4	Reporting the Levels of Detected Contaminants



Viewgraph: 112

The CCR rule established eight items of information that must be included in the CCR. Refer to the Implementation Guidance Section I, B.1: CCR Content Requirements for additional information.

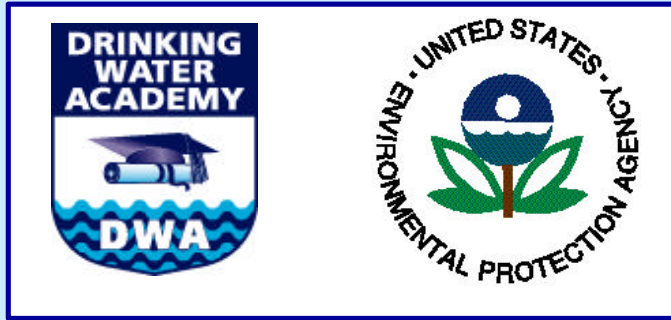
Report Content Requirements (cont.)

Item	Report Content Requirements
5	Information on <i>Cryptosporidium</i> , Radon, and Other Contaminants
6	Required Additional Health Information
7	Information on Violations of NPDWR
8	Information if the System is Operating Under a Variance or Exemption



Viewgraph: 113

How to Prepare a CCR



Viewgraph: 114

Where to Begin?

- Compile Essential Water System Data
- Compile Monitoring and Compliance Information
- Identify Data Required for the CCR
- Format Critical Data



Viewgraph: 115

Where to Begin? (cont.)

- Compile Desired Optional Information
- CCR Production
- CCR Delivery to Customers, Primacy Agency, etc.
- CCR Certification to Primacy Agency



Viewgraph: 116

Compile Essential Water System Data

- Data for the Previous Calendar Year
- The Most Recent Results (Up to 5 Years Old) for Contaminants Monitored Less Than Once per Year
- Compliance Data for Public Notice, Variance or Exemption Information
- Source Water Assessment Report, If Completed
- All Data Organized by Multiple Hydraulically Independent Distribution Systems



Viewgraph: 117

Compile Essential Water System Data (cont.)

- **Wholesalers Must Provide Data by April 19, 1999
and By April 1 of Subsequent Years**
- **Alternative Contractual Arrangements May Be
Made**
- **Retailer Is Responsible for Distribution of the
Report and Certification**



Viewgraph: 118

Compile Essential Water System Data (cont.)

- Telephone Number for Contact Person
- Non-English Speaking Notice
- Information on Opportunities for Public Participation
- Information on Source Water Assessments
- Type of Water
- Commonly-Used Name(s)
- Location(s) of Water Source



Viewgraph: 119

Compile Monitoring and Compliance Information: Compliance Status

- **Treatment Technique Violations, MCL Violations, or Other Violations of NPDWRs**
 - Monitoring Data Used to Determine Compliance
 - The Length of Each Violation
 - A Clear and Readily Understandable Explanation of the Violation
 - Potential Adverse Health Effects Using Mandatory Language
 - Actions Taken by the System to Address the Violation
 - Administrative or Judicial Order



Viewgraph: 120

Compile Monitoring and Compliance Information: Compliance Status (cont.)

- Requirements for Systems Operating under a Variance or Exemption
 - Explanation of the Variance or Exemption
 - Date of Issuance of the Variance or Exemption
 - Reasons for Issuance of the Variance or Exemption
 - Notices of Public Opportunity for Input in the Review or Renewal of the Variance or Exemption



Viewgraph: 121

Compile Monitoring and Compliance Information: Compliance Status (cont.)

- **Additional State-Specific Requirements (As Applicable)**
 - Fluoridation
 - Mandatory Disinfection of Ground Water
 - Operating Without a Certified Operator
 - Other



Viewgraph: 122

Identify Data Required for the CCR

- **Total Coliform**
 - For Systems Collecting Fewer than 40 Samples per Month, the Highest Monthly Number of Positive Samples
 - For Systems Collecting 40 or More Samples per Month, the Highest Monthly Percentage of Positive Samples
- **Fecal Coliform and *E. Coli***
 - The Total Number of Positive Samples



Viewgraph: 123

Identify Data Required for the CCR (cont.)

- 1 Sampling Site/1 Sampling Date:
 - March 1998: 0.003
 - Report in Table: Highest Detected Level = 0.003
 - Report No Range



Viewgraph: 124

Identify Data Required for the CCR (cont.)

- Multiple Sampling Sites/1 Sampling Date:

Barium	Feb 1998
Well 1	0.60
Well 2	0.46
Well 3	N/D

- Report in Table: Highest Compliance Level = 0.60 and Range: N/D - 0.60



Viewgraph: 125

Identify Data Required for the CCR (cont.)

- 1 Sampling Site/Multiple Sampling Dates:

Atrazine	1st Quarter 1998	2nd Quarter 1998	3rd Quarter 1998	4th Quarter 1998
Well 1 (ppb)	1	4	2	1

– Report in Table: Average = 2 and Range: 1 - 4



Viewgraph: 126

Identify Data Required for the CCR (cont.)

- Multiple Sampling Sites/Multiple Sampling Dates:**

total trihalomethanes	2nd quarter 1997	3rd quarter 1997	4th quarter 1997	1st quarter 1998	2nd quarter 1998	3rd quarter 1998	4th quarter 1998
site #1	-	-	-	45	60	125	70
site #2	-	-	-	40	55	115	60
site #3	-	-	-	45	60	105	70
site #4	-	-	-	50	65	135	80
quarterly average	55	125	65	45	60	120	70
rolling annual average	-	-	-	73	74	73	74

– Report in Table: Highest Compliance Level = 74 and Range 40 - 135



Viewgraph: 127

The last 3 quarters of the 1997 are shown because you need them to compute the rolling annual average. The range would include only detection data from 1998, unless one of the values from the previous year was so extraordinary that consumers would need it to understand the reported annual average.

If your rolling annual average exceeds 80 (the revised MCL effective in 2001), your report must include the health effects language for TTHMs, even though your system was not technically in violation yet.

Identify Data Required for the CCR (cont.)

- **Lead and Copper Rule**
 - The 90th Percentile Value of the Most Recent Round of Sampling **and** the Number of Sampling Sites Exceeding the Action Level
 - Lead Values and Educational Statement If More Than 5 Percent but Fewer Than 10 Percent (If 20 or More Samples Are Collected) of the Homes Sampled Exceed the Action Level



Viewgraph: 128

Identify Data Required for the CCR (cont.)

- Detected Unregulated Contaminants for Which Monitoring Is Required
- Such as Unregulated Organic Chemical Contaminants, but Excluding *Cryptosporidium* Monitoring Required by the ICR
 - The Average and Range at Which the Contaminant Was Detected



Viewgraph: 129

Identify Data Required for the CCR (cont.)

- Radiological Contaminants
 - Regulated Contaminants (Radium-226, Radium-228, Gross Alpha, and Beta Particle and Photon Radioactivity) When Detected at Levels above the Minimum Detection Limit
 - Radon, If Detected, Include the Results of the Monitoring and an Explanation of the Significance of the Results



Viewgraph: 130

Identify Data Required for the CCR (cont.)

- **Monitoring Results for Other Contaminants**
 - *Cryptosporidium*, If Detected in the Source Water or Finished Water, Include a Summary of the Results of the Monitoring and an Explanation of the Results of the Monitoring
 - Results for Giardia and/or Viruses Only If Found in Finished Water Through ICR Monitoring
 - Detected Chemical Contaminants for Which Monitoring Is Not Mandated (e.g. MTBE)



Viewgraph: 131

Identify Data Required for the CCR (cont.)

- The Likely Sources of Detected Contaminants to the Best of the Water System's Knowledge
- Information Sources:
 - Sanitary Surveys
 - Source Water Assessments
 - Other documents?



Viewgraph: 132

Identify Data Required for the CCR: Turbidity

- **Unfiltered Surface Water Required to Install Filtration**
 - The Highest Average Monthly Turbidity Value
- **Filtered Surface Water**
 - The Highest Single Turbidity Measurement and the Lowest Monthly Percentage of Samples Meeting the Appropriate Turbidity Limits
- **Unfiltered Surface Water Meeting Filtration Avoidance Criteria**
 - The Highest Monthly Turbidity Value



Viewgraph: 133

Identify Data Required for the CCR: DBPs

- Health Effects Language Must Be Included:
 - If System Serves over 10,000 Population; **and**
 - Is in Compliance with the Current MCL of 100 ppb for TTHMs **but** Exceeds 80 ppb TTHMs



Viewgraph: 134

Identify Data Required for the CCR: Source Water Assessments

- **If Completed:**
 - Notification to Customers of Availability of Assessment and Information on How to Obtain a Copy
 - If Assessment Was Provided or Approved by the Primacy Agency a Brief Summary of the System's Susceptibility to Potential Sources of Contamination



Viewgraph: 135

Identify Data Required for the CCR: Required Additional Health Information

- **Drinking Water/Bottled Water Contaminant Explanation**
 - Explanation Contains Both Mandatory Language and Language That Can Be Altered by the System
 - Mandatory Language [§141.153(h)(1)(iv) of the Rule]
 - Every CCR Must Contain This Text
 - Statement That the Presence of Contaminants Does Not Necessarily Indicate a Health Risk
 - Include EPA's Safe Drinking Water Hotline Number



Viewgraph: 136

The drinking water/bottled water contaminant explanation contains both mandatory language and language that can be altered by the system. The language of paragraph §141.153(h)(1)(iv) of the rule shown in Section I, B.1: Item 6 of the Implementation Guidance is mandatory. Every CCR must contain the statement that the presence of contaminants does not necessarily indicate a health risk, and reference EPA's Safe Drinking Water Hotline.

Identify Data Required for the CCR: Required Additional Health Information (cont.)

– Mandatory Language (cont.)

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPA's Safe Drinking Water Hotline (800-426-4791).

– Language That Can Be Altered by the System [§141.153(h)(1)(i) - (iii) of the Rule]

- Information on Sources of Drinking Water
- Contaminants That May Be Present in Source Water
- Why EPA and the Food and Drug Administration (FDA) Establish Regulations



Viewgraph: 137

CWSs must also include in this explanation information on sources of drinking water, contaminants that may be present in source water, and why EPA and Food and Drug Administration (FDA) establish regulations for contaminants respectively. CWSs have the choice of using the EPA language provided in §141.153(h)(1)(i) through (iii) of the rule or developing their own comparable language. The EPA language is also provided in the Implementation Guidance under Section I, B.1: Item 6.

Identify Data Required for the CCR: Required Additional Health Information (cont.)

- **Warning about the Vulnerability of Some Populations to Microbial Contaminants in Drinking Water**
 - **Explanation Encourages Those Who May Be Particularly at Risk from Infections to Seek Advice from Health Care Provider**
 - **EPA Safe Drinking Water Hotline Number Included to Access More Information**
 - **Mandatory Language Provided**



Viewgraph: 138

This mandatory vulnerable populations warning informs customers that some people may be more vulnerable to contaminants in drinking water than the general population and encourages those who may be particularly at risk from infections to seek advice from their health care provider.

Section I, B.1: Item 6 of the Implementation Guidance provides the required language.

Identify Data Required for the CCR: Required Additional Health Information (cont.)

- **Mandatory Language for Warning to Vulnerable Populations**

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. EPA/Centers for Disease Control and Prevention (CDC) guidelines on appropriate means to lessen the risk of infection by Cryptosporidium and other microbial contaminants are available from the Safe Drinking Water Hotline (800-426-4791).

- **Every CCR Must Contain This Explanation, Prominently Displayed Somewhere in the Report**



Viewgraph: 139

Format Critical Data: Numeric Presentation

- **Detected Contaminants Presented With MCL As a Number Greater Than or Equal to 1**
- **MCLG and Detected Level in Same Units As MCL**
- **Round Detected Levels Before Conversion**



Viewgraph: 140

Format Critical Data: Table(s)

- For Detected Unregulated Contaminants for Which Monitoring Is Required (except *Cryptosporidium*)
 - Table(s) Must Contain the Average of Any Monitoring Results from the Year and the Range of Detections
 - The CCR May Also Include a Brief Explanation for Why a System Monitors for Unregulated Contaminants



Viewgraph: 141

Format Critical Data: Table(s) (cont.)

- **Table(s) Must Contain The Likely Source(s) of Each Detected Contaminant, According to the Best Information Known to the Water System**
- **Specific Information Regarding Contaminants Should Be Used When Available**



Viewgraph: 142

Format Critical Data: Table(s) (cont.)

- For Any Detected Contaminant That Violates an MCL, a TT, or Exceeds an AL, the CCR Must Contain:
 - A Clear Indication in the Table(s) of the Violation or Exceedence
 - Near By, but Not In, the Table(s), a Clear and Easy to Understand Explanation of the Violation
 - An Explanation of the Violation Includes Length, Potential Health Effects, and CWSs Actions



Viewgraph: 143

Format Critical Data: Table(s) (cont.)

- **Systems That Distribute Water to its Customers from Multiple Hydraulically Independent Distribution Systems Fed From Different Raw Water Sources Should:**
 - Include in the Table(s) Separate Columns for Detection Data for Each Service Area
 - Include a Description of the Area Served by Each Distribution System



Viewgraph: 144

Format Critical Data: Rounding Data

- Prior to Conversion to MCL Equivalent Units
- Example: Glyphosate Detected at 0.055 mg/l

	Detected (mg/l)	Compliance (mg/l)	Multiply by. . .	Units For CCR (ppb)
Monitoring	0.055	0.06	1,000	60
MCL		0.7	1,000	700



Viewgraph: 145

When rounding off results to determine compliance with the MCL is allowed by the regulations, rounding should be done prior to multiplying the results by the factor listed in Appendix A to Subpart O of the rule. A copy of that appendix is provided in Appendix H, Table H-1 of the Implementation Guidance.

Compile Desired Optional Information

- System Map or Diagram
- Planned Projects or Known Future Needs
- Additional Concerns
 - Source Water Protection Efforts
- Results of Voluntary Monitoring
- Must Be Consistent With and Not Detract from the Purpose of the Report



Viewgraph: 146

CCR Layout

- Easy to Read
- Minimum Criteria for Data, Definitions and Educational Information
- Optional Information
- ★ Limit Text to Avoid Too Much Jargon or Too Much Information



Viewgraph: 147

CCR Delivery to Customers, Primacy Agency, Etc.

- Direct Delivery
- Good Faith Efforts to Non-Bill Paying Customers
- Advertise Availability
 - Internet
 - Newspaper



Viewgraph: 148

CCR Certification to Primacy Agency

- **Must Send Certification to the Primacy Agency No Later Than 3 Months After the Report Is Due**
- **Two Required Elements**
 - Distributed the CCR to Its Customers
 - Used in the Report Information That Is Correct and Consistent With Compliance Monitoring Data Previously Submitted to the Primacy Agency



Viewgraph: 149

Note: Some States may design their own certification and ask systems to send in as the certification.

Resources

- EPA Template (CCR Writer)
- American Water Works Association (AWWA) Template (CCR Builder)
- National Rural Water Association (NRWA) Template
- Midwest Assistance Program (MAP) Hard-Copy Template
- State-Specific Templates
- EPA Guidance for Water Suppliers



Viewgraph: 150

Links on the Internet

- Links to Individual System CCRs
 - EPA Will Work To Setup Links
 - AWWA Offering Service To Help Members Put CCRs On-Line



Viewgraph: 151

EPA Information on the Internet

- www.epa.gov/safewater
 - Fact Sheet On Drinking Water Regulations
 - Fact Sheet On Each Regulated Contaminant With Extensive Health Effects Information
 - CCR Rule, Summary Fact Sheet, Electronic Template for Operators
 - E-mail and Telephone Number Links for Answering Individual Questions



Viewgraph: 152

Workshops 2 and 3

- How to Prepare a CCR



Viewgraph: 153

These workshops will review, compile and format data to meet the requirements of the CCR. A fill- in-the-blank question sheet is used to place the information in the proper place.

It is expected most water systems will use a template or other means of producing a CCR. These exercises are intended to help sort essential information and familiarize participants with how data would be presented within a CCR.

A "key" produced using the same data and EPA's template will be provided at the end of the workshops.



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Viewgraph: 154